

Appendix 6
Question 31 to
Question 34

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	345
Filtered Respondents	329
Questions	<p>Question 31</p> <p>Do you think that we have covered all issues relating to green infrastructure?</p> <p>Yes / No</p> <p><i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	ID-4764268-QUESTION-31
Pivot	<i>(none)</i>
Document Name	Question 31 - Summary Report
Created on	2019-04-23 08:49:27
Created by	Strategic Planning Admin

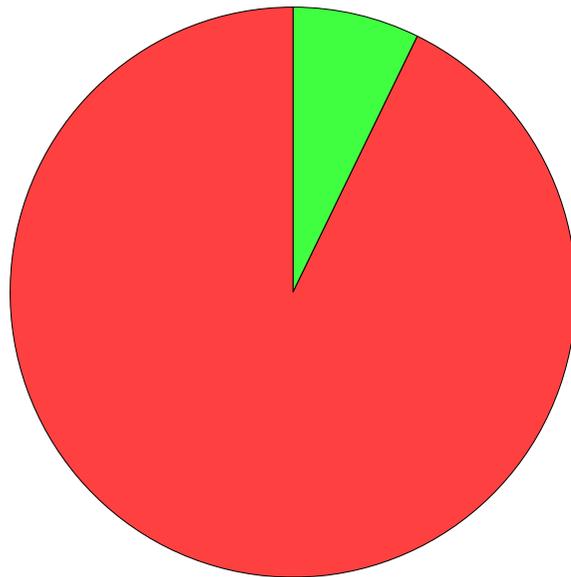
Your Opinion

Question responses: **345 (100.00%)**

Question 31

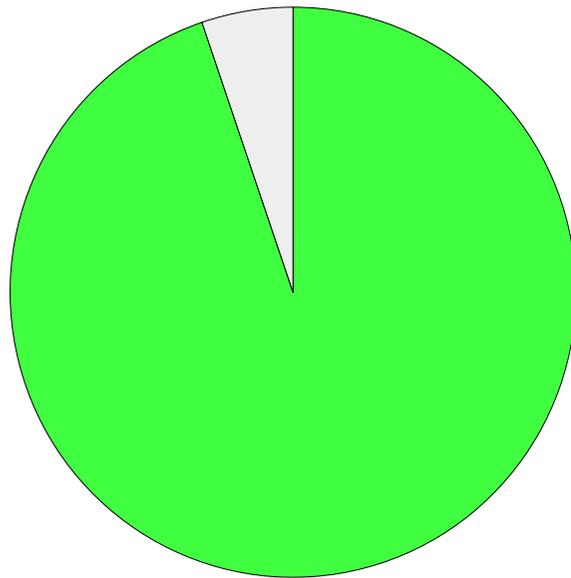
Do you think that we have covered all issues relating to green infrastructure?

Yes / No



	% Total	% Answer	Count
■ Yes	7.25%	7.25%	25
■ No	92.75%	92.75%	320
Total	100.00%	100.00%	345

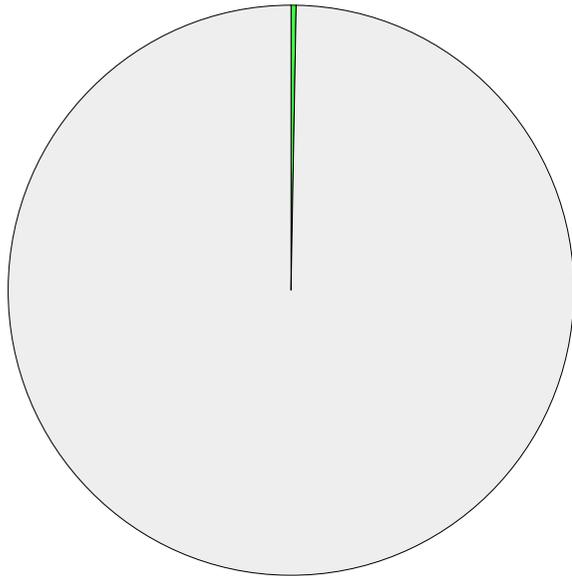
Responses

Question responses: **327 (94.78%)**

	% Total	% Answer	Count
■ Responses	94.78%	100.00%	327
■ No Response	5.22%	--	18
Total	100.00%	100.00%	345

Supporting evidence

Question responses: 1 (0.29%)



	% Total	% Answer	Count
<input checked="" type="checkbox"/> Response with File(s) Uploaded	0.29%	100.00%	1
<input type="checkbox"/> Response with No Uploads	99.71%	--	344
Total	100.00%	100.00%	345

Issues and Options All Responses to Question 31

Number	Question 31
ID	LPIO99
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 31
ID	LPIO297
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	If your core strategy is to protect and manage key areas of open space why are you proposing building on the green belt?
Include files	
Number	Question 31
ID	LPIO346
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	9.3.4 I think there is sufficient evidence to retain the green-belt.
Include files	
Number	Question 31
ID	LPIO377
Full Name	Mr Michael Bouvier
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/farmland directly conflicts with protection of our Chilterns AONB. The "vision" needs to place top priority on the protection of Green Belt. Development should not take place on green belt or green-field sites. Brownfield sites must be used.
Include files	
Number	Question 31
ID	LPIO466
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 31
ID	LPIO498
Full Name	Mrs Lynne Head
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	How can you say you want to protect the green belt when these proposals focus on wholesale development of it?
Include files	
Number	Question 31
ID	LPIO521
Full Name	Mr John Saunders
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 contradicts your proposed strategy
Include files	
Number	Question 31
ID	LPIO525
Full Name	Debbi James-Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	9.3.2 Our Core Strategy seeks to protect and manage 94 key areas of open space (greater than 1 hectare) as designated open space. This provides a structured approach to planning for green spaces which are not covered by other designations, such as Green Belt, Tree Preservation Orders, Listed Buildings or Conservation Areas. If this is really a Core Strategy, why are we even discussing building on Green Belt land?
Include files	
Number	Question 31
ID	LPIO550
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 31
ID	LPIO642
Full Name	Mrs Carole Stokes
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 or rural sites contradicts the strategy
Include files	
Number	Question 31
ID	LPIO683
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 31
ID	LPIO736
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	In his recent budget speech the Chancellor of the Exchequer said that Government policy was to NOT build on Green Field land and more recently the Mayor of London said that there would be NO development on Green Field sites within his area. Dacorum borough Council must follow these edicts.
Include files	
Number	Question 31
ID	LPIO753
Full Name	Mrs Victoria Vernon
Company / Organisation	Sport England
Position	Trainee Planer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Sport England is encouraged that the emerging local plan looks to include policies to protect & enhance existing sport/leisure facilities where there is a need to do so and to provide new sports/leisure facilities that are required to meet identified existing/future community needs which accord with paragraph 74 of the NPPF -

	<p>However, it is thought that the plan should also include policies requirements in major housing and mixed-use developments for sport/leisure provision, sports hubs allocations etc. Currently the plan only lists playing field requirements for developments of 500 dwellings. There is no mention of provision required for smaller or larger developments. This will result in only a small proportion of new developments making provision for playing fields as most developments are under this threshold and will cumulatively place pressure on existing facilities which may already be at capacity. The approach should be informed by the Council's Playing Pitch Strategy and Sport England can provide further advice upon request on the approach to sports provision in new development including a guidance on the use of CIL and Planning Obligations.</p>
Include files	
Number	Question 31
ID	LPIO843
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	
Include files	
Number	Question 31
ID	LPIO851
Full Name	Mr 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	tHERE IS ONLY ONE OPTION OPEN TO ME AND THAT IS OPTION 1A.
Include files	
Number	Question 31
ID	LPIO997
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The best way to retain green open spaces is not to build on existing green belt land. This policy contradicts your strategy.
Include files	
Number	Question 31
ID	LPIO1045
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	Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more. • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space.
Include files	
Number	Question 31
ID	LPIO1106
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	Although I agree that that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" I do not see how building on our green spaces enhances this. Concreting over a large area and providing a play area or pitch does not constitute providing open space. Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to

	emissions. It has been long accepted that Berkhamsted has too little green space within its boundaries and we cannot afford to lose any more.
Include files	
Number	Question 31
ID	LPIO1150
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 31
ID	LPIO1279
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	You are creating issues by putting forward proposals to build on Green Belt land which should not be permitted under this policy. If I have got confused it is because of the way this document is worded and the contradictions when it comes to protecting the area yet allowing mass development.
Include files	
Number	Question 31
ID	LPIO1332
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	Infrastructure needs have not been considered in Bovingdon. The village is already at capacity with regards to traffic and other needs and putting more housing will only add to this without then making Bovingdon into a town.

Include files	
Number	Question 31
ID	LPIO1406
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	You are trying to introduce these as an alternative to retaining the Green Belt
Include files	
Number	Question 31
ID	LPIO1507
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	Do not build on green belt land. Therefore not ruining the natural environment.
Include files	
Number	Question 31
ID	LPIO1548
Full Name	MR PETER SUMMERFIELD
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 Mr John Shaw's and Mr David Smith's comments
Include files	
Number	Question 31
ID	LPIO1630
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	Green infrastructure is lacking in Berkhamsted. Building on what there is, is not appropriate. Green open space needs to be local.
Include files	
Number	Question 31
ID	LPIO1633
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	Berkhamsted has a deficiency of public open space. Recreational space needs to be accessible to the local population without generating car journeys.
Include files	
Number	Question 31
ID	LPIO1706
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	It seems that what is proposed goes directly against your core strategy especially in Kings Langley, which is closely surrounded by green open space.
Include files	
Number	Question 31
ID	LPIO1710
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 to plan for protecting all open space for the future. Not just pick and choose what 'space' should be developed over as per ref 9.3.4
Include files	
Number	Question 31
ID	LPIO1810
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	Not in the least.
Include files	
Number	Question 31
ID	LPIO1895
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"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO2036
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	Inadequate definition of areas that need enhanced protection has meant the inability of enforcement of planning conditions that seek to conserve for example openness of agricultural green belt land; and narrow country lanes with steep chalk banks and hedgerows of historical significance are eroded beyond repair. For example Upper Bourne End Lane.
Include files	
Number	Question 31
ID	LPIO2051
Full Name	Mrs Jane Hennell
Company / Organisation	Canal & River Trust
Position	Area Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Our waterways are a valuable part of the strategic and local green infrastructure network. They also provide an important wildlife route and act as stepping stones for mitigation against habitat loss, dispersal and the genetic exchange of plants.
Include files	
Number	Question 31
ID	LPIO2099
Full Name	Mr David Holwell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	9.3.1 Your core strategy contradicts your long term views on "Green Infrastructure" if you build on the Green Belt there will not be any open spaces particularly in Kings Langley! Rectory Farm is a case in point, this would be the perfect site for a nature reserve and ecological educational site.

	<p>The local children would benefit from having studies in a fresh air environment in fact everyone would be able to enjoy a nature reserve!</p> <p>How nice it would be to have our own open space and not have to get in the car polluting and congesting roads as we go to Ashridge and Chipperfield !</p>
Include files	
Number	Question 31
ID	LPIO2173
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	Given that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" –how does building on Green Belt comply?!
Include files	
Number	Question 31
ID	LPIO2258
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>Kings Langley has one small children's park in Dacorum and one small children's park as part of Three Rivers DC. There is a tiny outdoor public space in the new ovaltine development for kids to play. This tiny amount of green space is for approximately 8,000 residents. A lot of people use the canal to walk along which is beautiful but flat and not great for getting one's heart rate up. We also have to share the canal with cyclists who use it more and more regularly as a form of transport connectivity between Hemel and Watford because there are no other practical and safe alternative cycle lanes provided and the roads are full of potholes and unsafe for cyclists. The canal path is not wide enough to safely handle Cyclists and walkers with dogs and small children at the same time. Precisely why the residents all rely on the public foot paths through the green belt to get out into hilly green space for their mental and physical well being. Yet, you propose that we give it up for housing development. NO!</p>
Include files	

Number	Question 31
ID	LPIO2336
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	Looking at the proposed sites for development around Tring, building on Green Belt is completely inconsistent with meeting the area's green infrastructure needs. It is simply not good enough that DBC espouses fine policies but then contemplates actions which are wholly in contradiction to those policies.
Include files	
Number	Question 31
ID	LPIO2431
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	There needs to be a grading for these green and blue spaces balancing the value for wildlife and nature and for leisure. Nature should be given some undisturbed "quiet" spaces. There should definitely be a plan to create and develop more of these spaces, not just protect the ones we have and look at future needs .
Include files	
Number	Question 31
ID	LPIO2436
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	Residents should not be subsidising the profits of developers, particularly as it is to support development and infrastructure we do not want.

	Developers and/or the new owners of the properties should pay for the necessary infrastructure improvements through whatever legal instruments are available to effect this..
Include files	
Number	Question 31
ID	LPIO2491
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	contradictions are evident here, be clear you cannot propose such significant changes to the environment and try to retain a "Green" infrastructure
Include files	
Number	Question 31
ID	LPIO2626
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	A comprehensive green infrastructure strategy starts with marinating the green belt to stop coalescence by the village with the towns. The green bel provides the green lungs and natural recreational space in Dacorum and these proposals threaten the loss of this essential asset.
Include files	
Number	Question 31
ID	LPIO2678
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	Greenbelt land needs protection.
Include files	

Number	Question 31
ID	LPIO2885
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"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO3171
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>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions. Residents need access for dog walking, children's play areas, areas of tranquillity which connect to nature on the doorstep. This is essential for good mental health and wellbeing. Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained. Concreting over a large area and providing a play area or pitch does not constitute providing open space.</p>
Include files	
Number	Question 31

ID	LPIO3177
Full Name	Mr John Walker
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 31
ID	LPIO3211
Full Name	Mrs Juanita Mann
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>With higher density building we need more green space not less.</p> <p>The Green Belt cannot and should not be replace by token gesture small green spaces. (this is not an acceptable compromise)</p> <p>The Green Belt should remain and green spaces should be an essential part of any development, especially those aimed at people with young families</p>
Include files	
Number	Question 31
ID	LPIO3241
Full Name	Mr George Wheway
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 essential that the green belt sites around Kings Langley are protected. They are the lungs of the village, they separate the village from the M25 and A41, they improve the villagers wellbeing in countless ways from places to walk our dogs to the scenic views they offer.</p> <p>Rectory farm has one of the few remaining wildlife corridors bordering the river gade.</p>

	Green belt land can in law only be developed with the support of local people and you do not have our support.
Include files	
Number	Question 31
ID	LPIO3443
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>The green space around our village which is an important natural and educational resource which cannot be replaced by a square of grass with a climbing frame in one corner.</p> <p>Wayside Farm encourages everyone to visit and helps children to understand the importance of protecting our countryside and where milk comes from and how animals should be looked after. Shendish has a golf course for adult exercise and enjoying open spaces.</p> <p>The land adjacent to the canal at Rectory Farm should be enhanced as a natural wildlife corridor which residents could access and enjoy.</p> <p>All the land surrounding the village should become a strategic open space.</p>
Include files	
Number	Question 31
ID	LPIO3489
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	<p>Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here"</p> <p>This is at odds with the proposed building of housing on greenbelt land</p>
Include files	
Number	Question 31
ID	LPIO3591
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	The four sites you are proposing for Kings Langley are all Green Belt, so your wording above about protecting Green areas is just rhetoric and is easily seen through. Back your wording with guarantees about protecting our invaluable and priceless green areas for future generations.
Include files	
Number	Question 31
ID	LPIO3657
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	This should include the preservation of the quality of experience of footpath users, particularly when large developments take place. Criteria should be: <ul style="list-style-type: none"> • Minimal diversion of route, • Maintenance of rural footpath character (i.e. pedestrian-only use, no tarmac, garage forecourts, urban pavements, playing field equipment or pitches), • Extra tree lines to protect, and means of preventing motorcycle and flytipping access.
Include files	
Number	Question 31
ID	LPIO3724
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	This needs to be a major consideration for Be-h4
Include files	
Number	Question 31
ID	LPIO3852
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	Proposing to build on green belt land contradicts the protection of it.
Include files	
Number	Question 31
ID	LPIO3923
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	DBC's proposals to build on Green Belt land on all sides of Kings Langley do not constitute sound green infrastructure policy.
Include files	
Number	Question 31
ID	LPIO3975
Full Name	Mr Tim Varley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	What is your "Proposed Approach"?
Include files	
Number	Question 31
ID	LPIO4154
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	Tring is surrounded by a wonderful natural environment but green space and green corridors are important within

	Tring as well. These need to be protected from development.
Include files	
Number	Question 31
ID	LPIO4233
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	Green Infrastructure is an important part of the character of Kings Langley and is important not only for preserving the natural setting and historic character of the village but to keep the distinct character of the village separate from Hemel Hempstead to the north and Hunton Bridge / Abbots Langley / Leavesden to the south and Chipperfield to the west. These gaps are extremely fragile, and their integrity is essential for protection against coalescence both physically and perceptually. These gaps are under threat by the proposed developments at Shendish, Hill Farm, Wayside Farm and Rectory Farm and should be formally designated as strategic gaps to prevent coalescence now and for the future.
Include files	
Number	Question 31
ID	LPIO4248
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	
Include files	
Number	Question 31
ID	LPIO4358
Full Name	Mr Bruce Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As before, great principles but how does building on Green Belt around Berkhamsted possibly comply.
Include files	
Number	Question 31
ID	LPIO4384
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	Cake and eat it comes to mind.. how can you build significant amount of new builds and protect and create more green space?
Include files	
Number	Question 31
ID	LPIO4407
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Lacks a commitment not to infringe green belt under any circumstances.
Include files	
Number	Question 31
ID	LPIO4472
Full Name	Mr Philip Homer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The proposed building of extensive developments on the green belt is in direct opposition to your stated policy of protecting open spaces. Building a thousand homes on a green belt site and then pointing to a small park or two on the estate and pointing to that as protecting the green infrastructure is completely disingenuous.

Include files	
Number	Question 31
ID	LPIO4517
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	Berkhamsted needs more playing fields as there are not enough per capita already for those living there. It would be foolish therefore to allow Haslam Fields to be sold for housing. Planning permission should not be given for housing but it should be bought for community sports fields if the Berkhamsted School still wish to sell it other than just to make a lot of money selling it for housing.
Include files	
Number	Question 31
ID	LPIO4524
Full Name	Mr Nick Sandford
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 section makes no mention of the importance of trees and woods as part of green infrastructure or indeed of the importance of other types of natural greenspace. The Case for Trees (Forestry Commission, July 2010) states:</p> <p>‘There is no doubt that we need to encourage increased planting across the country – to help meet carbon targets – and every tree can count towards those targets as part of a renewed national effort to increase the country’s overall woodland canopy.</p> <p>But it’s not all about carbon; there is a growing realisation among academics about the important role trees play in our urban as well as the rural environment. It has long been accepted and confirmed by numerous studies that trees absorb pollutants in our cities with measurable benefits to people’s health – such as reducing asthma levels. Yet trees also deliver a whole host of other extraordinary economic, environmental and social benefits.’</p> <p>The report goes on to say:</p> <p>‘The development of the space in which we live and work represents an opportunity for change that may not be</p>

	<p>repeated for many years. Making the right decisions at these pivotal moments</p> <p>can influence peoples' sense of place, health and wellbeing for generations.'</p> <p>The Woodland Trust believes that woodland creation is especially important for green infrastructure provision because of the unique ability of woodland to deliver across a wide range of benefits – see our publication Woodland Creation – why it matters (http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx). These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).</p> <p>Para 9.3.4. refers to the role of national standards for greenspace. The Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and wellbeing provision.</p> <p>Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for, encapsulated in our Space for People publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure for health benefits.</p> <p>The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. <p>We would like to see this standard adopted and applied in your Local Plan.</p>
Include files	
Number	Question 31
ID	LPIO4566
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 31

ID	LPIO4575
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	This section should recognise the importance of ecological corridors and networks in green infrastructure. It could reference the Lawton report (http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/348423/lawton-report-2015-06-16.pdf) and also the Chilterns AONB Management Plan's biodiversity aim: "Enhance ecological networks so that they are bigger, better, more resilient, joined up and dynamic" (see http://www.chilternsaonb.org/conservation-board/management-plan.html). With much of Dacorum's population on the doorstep of the Chilterns AONB, connections into the vast public rights of way network of the Chilterns (including the Ridgeway National Trail) should be cherished and invested in.
Include files	
Number	Question 31
ID	LPIO4602
Full Name	Dr Alasdair Malloy
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 at all in The Green Belt.
Include files	
Number	Question 31
ID	LPIO4717
Full Name	Mr Andrew Criddle
Company / Organisation	Tring Sports Forum
Position	Vice Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There needs to be specific attention given to planning the development of sporting facilities across the Borough, and especially in Tring, in order to meet not only the

	increased demand but also the current under supply of sporting facilities. It is especially important that any additional playing space is coordinated with community need. In particular, if new facilities are to be managed by community clubs then additional playing fields need to be provided in contiguous hubs rather than allowing detached and ad hoc allocations by developers within new housing development sites. We are happy to liaise with DBC Planners on the allocation of new playing field spaces within Tring.
Include files	
Number	Question 31
ID	LPIO4742
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	Too much Green Belt land has been considered as dispensable.
Include files	
Number	Question 31
ID	LPIO4873
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	Using green belt and open agriculture land is contrary to providing ... ' an important social, economic and environmental role [which] is essential for our quality of life'. The use of the open farmland above Piccotts End would breach that commitment.
Include files	
Number	Question 31
ID	LPIO4947
Full Name	Mr Roger Jackson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In Tring the plan is for 100% of the development to be in Green Belt. Clearly Dacorum Council is not thinking about green infrastructure for the existing population.
Include files	
Number	Question 31
ID	LPIO5056
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 agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – but if this is the case, how would building on all of the Green Belt land surrounding Berkhamsted fit with this??</p> <p>With regard to play provision for children and young people, merely tarmacing over a large area to provide a play area or pitch does not constitute providing open space! Leisure and recreational spaces need to be accessible to the younger population locally, without generating additional car journeys by their parents that would add to emissions.</p> <p>By comparison with Hemel Hempstead, Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is therefore made of adjacent sites, currently within the green belt, many of which are being postulated for future development. This green open character of the surroundings to Berkhamsted needs to be retained, and not released from its vital purpose!</p>
Include files	
Number	Question 31
ID	LPIO5079
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	Getting rid of precious Green belt will not attract people to this area as all that we will have left is concrete and housing
Include files	
Number	Question 31

ID	LPIO5151
Full Name	Miss michelle hilditch
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	what has been proposed in the core strategy goes directly against the local sites selected for development. We don't need to build green belt and when we have enough brown belt. '
Include files	
Number	Question 31
ID	LPIO5165
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	The strategy to develop on a number of Green Belt sites surrounding Kings Langley seems diametrically opposed to the idea that open space is important. Replacing large areas of countryside with a park or a small area of open space as part of a development does not meet the same needs.
Include files	
Number	Question 31
ID	LPIO5278
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	Kings Langley is surrounded by and achieves its separate identity as a village from the green spaces around it. If the four Green Belt sites in the consultation document were to be developed, this would be the end of an historic village the beginning of a town. Not only that, the village would to all
Include files	

Number	Question 31
ID	LPIO5279
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	Kings Langley is surrounded by and achieves its separate identity as a village from the green spaces around it. If the four Green Belt sites in the consultation document were to be developed, this would be the end of an historic village the beginning of a town. Not only that, the village would to all intents and purposes coalesce with surrounding built up areas. These sites must be regarded as green infrastructure and benefit from the protection as such.
Include files	
Number	Question 31
ID	LPIO5325
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 best way to retain green open spaces is not to build on existing green belt land. This policy contradicts your strategy over and over again.
Include files	
Number	Question 31
ID	LPIO5336
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	However... as with most of the points in this consultation, the actual situation isn't what is being reflected here. this may be the ideal, but throughout the consultation we have seen plans for changing what the green belt actually consists of so that development of the released

	<p>land can be progressed, which is contradictory. What is to stop this from happening now and repeated again until we have no green land and every area within decorum as joined into one big suburb, where Tring, Berkhamstead and Kings Langley become 'Milton Keynes' around Hemel Hempstead and Watford. Milton Keynes used to be a village!!!</p> <p>In my view, to encourage the use and preservation of our green land and to attempt to control our impact on the climate is the only thing that will preserve our land.. This needs to be a focus otherwise the current status quo will continue.</p>
Include files	
Number	Question 31
ID	LPIO5364
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 these should not be an alternative to retaining the green belt.
Include files	
Number	Question 31
ID	LPIO5399
Full Name	miss tracy flint
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	More needs to be done to protecting our greenbelt and open spaces, brownfield sites should be looked into first before anything else.
Include files	
Number	Question 31
ID	LPIO5418
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	An aspect to include is the residual impact of adjacent developments on such areas. An additional element is to ensure hat there is adequate space left to surround such areas, in other words, you do not go directly from such an area to a development.
Include files	
Number	Question 31
ID	LPIO5463
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	Proposals to build large numbers of homes on accessible Green Belt land at Hill Farm. Rectory Farm, Wayside Farm and Shendish are wholly incompatible with the need to protect Green Infrastructure.
Include files	
Number	Question 31
ID	LPIO5590
Full Name	Mr Michael Ridley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Playing fields, etc, while highly desirable, are not "Green" in the ecological sense.
Include files	
Number	Question 31
ID	LPIO5604
Full Name	Mrs Christine Cosgrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	by de classifying greenbelt sites you are destroying the green infrastructure in the villages around hemel hempstead which will result in a greater urban sprawl
Include files	
Number	Question 31
ID	LPIO5695
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 31
ID	LPIO5894
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. Building on the Green Belt would not seem to comply with the goals set out in this section of the Plan. In addition, we would note that there is already a recognised deficiency of green spaces in Berkhamsted and many sites are not open to the public and some are among those being offered for development. The Council should focus on opening up more spaces for the local community.
Include files	
Number	Question 31
ID	LPIO5926
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	Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions.

Include files	
Number	Question 31
ID	LPIO5997
Full Name	Mr Quentin Ross-Smith
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 build on Green Belt land as this will change the whole character of villages such as Kings Langley. We need this space for everyone to experience the country side and learn from it. People learn a great deal from Way Side Farm, by taking their children to visit the cows and understand where milk comes from.
Include files	
Number	Question 31
ID	LPIO6072
Full Name	Mr Fred Preston
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 know whether to answer yes or no here. Issues appear to be covered but are contradictory. 9.3.2 states that the " Core Strategy seeks to protect and manage 94 key areas of open space". This is very laudable but it contradicts plans to build on anything other than brown field sites. The Green Field Land should be preserved, once lost it cannot be replaced.
Include files	
Number	Question 31
ID	LPIO6359
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	
Include files	

Number	Question 31
ID	LPIO6384
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	9.3.1. states The quality of green spaces in Dacorum attracts people and families to live, work and play here.' . Why, then, are DBC prepared to allow development on a significant part of it?
Include files	
Number	Question 31
ID	LPIO6419
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	Contradiction between development and protection of green infrastructure and spaces.
Include files	
Number	Question 31
ID	LPIO6687
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	Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on the Green Belt land surrounding Kings Langley comply?
Include files	
Number	Question 31
ID	LPIO6865
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	Unfortunately this is a contradiction. By expanding town boundaries you will be reducing residents access to the countryside.
Include files	
Number	Question 31
ID	LPIO6911
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	Yes, the Green Infrastructure requirements have been addressed in the 4 proposed development but the Village's core medical, educational, community facility along with parking and road requirements have not.
Include files	
Number	Question 31
ID	LPIO6975
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	Tring is surrounded by the green belt AONB and SSI/ It must be protected and enhanced.
Include files	
Number	Question 31
ID	LPIO7121
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>BRAG RESPONSE TO Q31 (FULL DOC ATTACHED TO Q46)</p> <p>Question 31</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?</p> <p><input type="checkbox"/></p> <p>Concreting over a large area and providing a play area or pitch does not constitute providing open space</p> <p><input type="checkbox"/></p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p> <p><input type="checkbox"/></p> <p>Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained</p>
Include files	
Number	Question 31
ID	LPIO7282
Full Name	Hilary Wight
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I object to the plan which I believe

	- fails to address the increased pressure that expansion would put on infrastructure;
Include files	
Number	Question 31
ID	LPIO7332
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 31 (please note full document is attached to Q46)</p> <p>Question 31</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?</p> <p><input type="checkbox"/></p> <p>Concreting over a large area and providing a play area or pitch does not constitute providing open space</p> <p><input type="checkbox"/></p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p> <p><input type="checkbox"/></p> <p>Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green</p> <p>open character needs to be retained</p>

Include files	
Number	Question 31
ID	LPIO7420
Full Name	Vivien Stovold
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 vital the Council control development in a manner to ensure that public utilities and the infrastructure, together with education and health services, can effectively cope with the expansion.
Include files	
Number	Question 31
ID	LPIO7501
Full Name	Ruth Briggs
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 does not consider wider infra-structure issues such as nearest A&E and hospital services, GP services. train services from the town, ability to expand senior school places, social support for a growing population with the needs of ageing and other support needs.
Include files	
Number	Question 31
ID	LPIO7511
Full Name	Annette Harrison
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 very concerned about the possibility of the River Gade, a rare Chiltern chalk stream drying up. I am sure you are aware that much of this river is currently only a

few inches deep (or less.) Please would you provide answers to the following:-

- 1 What research have you carried out regarding how the countryside wildlife (inc River Gade) will be affected in the Piccotts End area?
- 2 What impact will the current housing plan have on the surrounding Green Belt Land wildlife?
- 3 When was the research completed and which organisations were contacted?
- 4 What research have you carried out with regard to how a large housing estate will affect the flow of the River Gade?
- 5 Do you accept that your current housing plan will threaten the current flow and volume of the River Gade?
- 6 Are you aware that the Water Vole is legally protected in the UK under Schedule 5 of the 'Wildlife and Countryside Act, 1981'?
- 7 Are you aware that Water Voles are protected against intentional killing, capture or injury and intentional or reckless disturbance, obstruction, damage or destruction of their burrows?
- 8 Are you are aware that Water voles are species of principal importance under the 'Natural Environment and Rural Communities (NERCS) Act 2006', and local authorities and other public bodies have a legal duty to take Water Voles and their conservation into account. They are also a material consideration in the planning process?
- 9 Badgers are protected under the 'Protection of Badgers Act 1992' - how do you plan to protect these badgers during the building process?

10. There are many Newts in the River Gade - all species are protected under the 'Wildlife and Countryside Act, 1981 - how do you plan to protect the Newts of the River Gade?

- 1 Under the Freedom of Information Act please provide documentation of the research that was carried out for the protection of the Water Voles, Badgers, Kingfishers, Owls, Newts, Bats and other wildlife animals?
- 2 Under the Freedom of Information Act please provide documents to show how the increase of traffic will affect Piccotts End post completion of house building?
- 3 Under the Freedom of Information Act please provide documents of all research that was carried out confirming that there will be no increase flooding post completion of house building?)

Please note that I am happy to provide photographs recently taken in my garden to support the existence of Kingfishers, Bates and Water Voles (30 October, 2017.)

Include files	
Number	Question 31
ID	LP107517
Full Name	Paul Harrison
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 very concerned about the possibility of the River Gade, a rare Chiltern chalk stream drying up. I am sure you are aware that much of this river is currently only a few inches deep (or less.) Please would you provide answers to the following:-</p> <p>What research have you carried out regarding how the countryside wildlife (inc River Gade) will be affected in the Piccotts End area?</p> <ol style="list-style-type: none"> 1 What impact will the current housing plan have on the surrounding Green Belt Land wildlife? 2 When was the research completed and which organisations were contacted? 3 What research have you carried out with regard to how a large housing estate will affect the flow of the River Gade? 4 Do you accept that your current housing plan will threaten the current flow and volume of the River Gate? 5 Are you aware that the Water Vole is legally protected in the UK under Schedule 5 of the 'Wildlife and Countryside Act, 1981'? 6 Are you aware that Water Voles are protected against intentional killing, capture or injury and intentional or reckless disturbance, obstruction, damage or destruction of their burrows? 7 Are you aware that Water voles are species of principal importance under the 'Natural Environment and Rural Communities (NERCS) Act 2006', and local authorities and other public bodies have a legal duty to take Water Voles and their conservation into account. They are also a material consideration in the planning process? 8 Badgers are protected under the 'Protection of Badgers Act 1992' - how do you plan to protect these badgers during the building process? <p>10. There are many Newts in the River Gade - all species are protected under the 'Wildlife and Countryside Act, 1981 - how do you plan to protect the Newts of the River Gade?</p> <ol style="list-style-type: none"> 1 Under the Freedom of Information Act please provide documentation of the research that was carried out for the protection of the Water Voles, Badgers, Kingfishers, Owls, Newts, Bats and other wildlife animals? 2 Under the Freedom of Information Act please provide documents to show how the increase of traffic will affect Piccotts End post completion of house building? 3 Under the Freedom of Information Act please provide documents of all research that was carried out confirming that there will be no increase flooding post completion of house building?)

	Please note that I am happy to provide photographs recently taken in my garden to support the existence of Kingfishers, Bates and Water Voles (30 October, 2017.)
Include files	
Number	Question 31
ID	LPIO7918
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 31
ID	LPIO7957
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 Q31</p> <p><input type="checkbox"/></p> <p>Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here"—Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?</p> <p><input type="checkbox"/></p> <p>Concreting over a large area and providing a play area or pitch does not constitute providing open space</p> <p><input type="checkbox"/></p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p> <p><input type="checkbox"/></p> <p>Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green</p>

	open character needs to be retained
Include files	
Number	Question 31
ID	LPIO8006
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	At several points in the Site Appraisals document it is suggested that taking land out of Green Belt at point A might be compensated for by substituting a similar area at point B. This utterly misses the point of Green Belt designation.
Include files	
Number	Question 31
ID	LPIO8112
Full Name	Mr John Ebdon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Explicit reference should be made to protecting and enhancing the local footpath network, including the preservation of the open views to be had from many such routes.
Include files	
Number	Question 31
ID	LPIO8455
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

	<p>their comments which should also be regarded as my own.</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO8552
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>.</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space

	<ul style="list-style-type: none"> Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO8580
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31

ID	LPIO8628
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO8674
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- Contradicted entirely by proposals to build on the Green Belt, green fields and farms.
Include files	

Number	Question 31
ID	LPIO8742
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO8752
Full Name	David Fitches
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 not managed to attend any of the exhibitions or meetings you referred to. However, there are some matters I would like to address. The land between Gadebridge Lane and Galley Hill which I would consider part of Gadebridge Park was ear marked for

	development when John Prescott was part of the labour government. Any development of this land will have a significant detrimental effect on Gadebridge Park. Currently as you travel out of the town on the Leighton Buzzard Road there is a feeling of countryside.
Include files	
Number	Question 31
ID	LPIO8774
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	Not if green infrastructure has to come at the cost of green belt land.
Include files	
Number	Question 31
ID	LPIO8844
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions

	<ul style="list-style-type: none"> Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO8880
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	Q31-NO Throughout the document Hemel has priority despite Berkhamsted having currently a higher build rate
Include files	
Number	Question 31
ID	LPIO9027
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 31
ID	LPIO9038
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 31

ID	LPIO9500
Full Name	Duncan Eggar
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	BOROUGH COUNCIL and COUNTY COUNCIL RESPONSIBILITIES. Regardless of personal preferences I find it very difficult to make meaningful comment without an better appreciation of the proposed infrastructure provision for the various options proposed. I understand the difficulty of development responsibility lying at BC level and much of the infrastructure at CC level, but without the one the other is somewhat meaningless. Please will you demonstrate a closer working relationship between the various levels of government.
Include files	
Number	Question 31
ID	LPIO9588
Full Name	Mark Somervail
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	1 Green space The plans do not adequately cover parks and green space which need to be within a child's walking distance of each development. Some of the proposed development areas include existing small woods & copses which should be preserved and incorporated into green spaces within the new developments. Examples include the 2 copses in the middle and North sides of area Be-h4.
Include files	
Number	Question 31
ID	LPIO9776
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO9824
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LP109999
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space

	<ul style="list-style-type: none"> Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10047
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10116
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10164
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

	<p>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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10221
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>....</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p>

	<ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10268
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>.....</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without

	<p>generating additional car journeys and adding to emissions</p> <ul style="list-style-type: none"> • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10318
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10366
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10391
Full Name	Ben Stutman
Company / Organisation	Buckinghamshire County Council
Position	Growth & Strategy Graduate Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Issue 23 discusses the green infrastructure needs of the Local Plan and refers to the protection and management of designated open spaces, recognising that providing a range of open space areas alongside future growth can seek to address the deficiencies in open space provision. However there appears to be limited focus on</p>

	<p>other types of important GI such connected green and blue infrastructure networks, green access routes and wildlife habitats. The plan will need to look for opportunities to improve GI connectivity across administrative boundaries, ensuring that policies and maps are effectively co-ordinated to allow for the potential of joint cross border projects to improve GI networks.</p> <p>We suggest referring to the ‘Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes which has been produced by the Bucks and MK NEP. Principles 7 of the document states that GI creation and improvement should be coordinated with activities cross-border, highlighting that ‘local authorities and others will have to work across administrative boundaries if we are to focus on the NPPF’s “coherent ecological networks that are more resilient to current and future pressures”. http://www.bucksmknep.co.uk/wp-content/uploads/2016/09/NEP-GI-Vision-and-Principles-FINAL.pdf. BCC would like to see principle 7 considered as part of the emerging local plan.</p>
Include files	
Number	Question 31
ID	LPIO10432
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without

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Include files	
Number	Question 31
ID	LPIO10481
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10531

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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10579
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10626
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space

	<ul style="list-style-type: none"> Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10676
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10724
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10759
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 potential of Green Belt sites to contribute towards a strong Green Infrastructure in Dacorum needs to be considered. Paragraph A.62 of the Housing White Paper explains that in future the Government expects to see 'compensatory measures' included in policies where Green Belt is proposed for release. This could include measures to widen public access to the Green Belt, or ecological and biodiversity enhancements. The ability of Green Belt sites to provide these must be taken into account. The sites promoted by Taylor Wimpey provide the potential to do this; land at Homefield, Bovingdon could create new walking routes towards the surrounding</p>

	<p>countryside alongside open space and boundary enhancements, whilst land at Darrs Lane, Berkhamsted, offers a unique opportunity to enable public access to a large area of Green Belt in the form of a countryside park.</p> <p>For full response please see question 46.</p>
Include files	
Number	Question 31
ID	LPIO10817
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO10870
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LP1010918
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	

Include files	
Number	Question 31
ID	LPIO10967
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11018
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11065
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	
Include files	
Number	Question 31
ID	LPIO11145
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"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11192
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	No not as far as existing Green Belt is concerned in selecting the best strategy.
Include files	
Number	Question 31
ID	LPIO11239
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>BRAG response to Question 31 (please note full document is attached to Q46)</p>

	<p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11289
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is

	made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11377
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11426
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>....</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11455
Full Name	Mr & Mrs J Neale
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Kings Langley Common is a valuable resource but otherwise the village has very limited level green space as in summer weekends the cricket pitch is often unavailable.</p>

Include files	
Number	Question 31
ID	LPIO11535
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 consultation documents (Site Appraisals) suggest that removing land from the Green Belt in one location could be offset by substituting similar at another location, which is both inappropriate and contrary to the purpose of the Green Belt.</p> <p>In any case, the recent removal of 82.2 hectares of land from the Green Belt via the six Local Allocations in the 2006-2031 Core Strategy has already caused irreparable harm to the borough's open space and green infrastructure. The borough needs to ensure no further land is removed from the Green Belt.</p>
Include files	
Number	Question 31
ID	LPIO11615
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p>

	<ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11652
Full Name	john and barbara neale
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Kings Langley Common is a valuable resource but otherwise the village has very limited level green space as in summer weekends the cricket pitch is often unavailable.
Include files	
Number	Question 31
ID	LPIO11770
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	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

	<p>emphasize just a few of the most important points within that response below.</p> <p>...</p> <p>Brag Response to question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO11812
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	Reduction in the Green Belt will adversely impact the green infrastructure (eg. loss of leisure, recreation, rambling, wildlife, etc if Shendish is developed)
Include files	
Number	Question 31
ID	LPIO11920
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>It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.</p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p>
Include files	
Number	Question 31
ID	LPIO11966
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><i>As for Question 30, Identification does not bring solution - as said in consultation, Delivering infrastructure for scattered or small-scale growth can be very challenging, as it requires piecemeal upgrades to existing facilities, which may not always have the space or ability to expand. 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.but not all infrastructure is covered by developer contributions</i></p>
Include files	
Number	Question 31
ID	LPIO12068
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>Standard BRAG response to Question 31. Please note full document is attached to Question 46</p>

	<p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12125
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 plans need to provide more information on its approach to strategic green infrastructure. Plans on a Borough-wide basis are required to ensure that existing areas of green space are linked together and that any significant developments include networks of green infrastructure that link the countryside into the towns.</p>
Include files	
Number	Question 31
ID	LPIO12161
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>Standard BRAG response to Question 31. Please note full document is attached to Q46.</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12223
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p>

	<p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LP1012302
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>Standard BRAG response to Question 31. Please note full document is attached to Question 46.</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without

	<p>generating additional car journeys and adding to emissions</p> <ul style="list-style-type: none"> Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12368
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
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>We are seriously concerned about the ambiguity of para 9.3.4 which brings into question DBC's approach to future Green Belt areas and to the type of development abutting the Chilterns AONB.</p> <p><i>"We are updating our evidence base to understand the types of open space we need to protect and whether we need to apply new provision standards. Our general approach will be to meet national standards but we will also consider if any local variation is appropriate."</i> This ambiguity needs to be resolved with complete clarity and policy before final consultation prior to Plan submission.</p> <p><i>In addition, the general principle on biodiversity should be no net loss of overall green cover.</i></p> <p>Page 82 play areas; mixed play areas; play fields/"additional" open space.</p> <p>Sites Tr-h1; Tr-h2 and Tr-h3 are proposed for potentially being linked together. This generates approx. 1,500 new homes. The table at page 82 of the Plan fails to provide for play space/playing fields/open space on developments of that size. We would recommend that Trh3 therefore also be required to have 1.6ha open space and play area.</p> <p>Wildlife corridors. Most Tring sites have existing wildlife corridors (please see next paragraph for specifics). These green corridors (bushes/trees/hedges/ditches/banks/scrub) need to be continuous to allow free movement of creatures (including birds, butterflies, bees, insects, spiders) providing rich biodiversity including wild flowers and food sources for these creatures and pleasure to people walking and cycling.</p>

Pockets of unconnected open space are of limited value, especially if kept manicured.

Provision for biodiversity. This could include green roofs or walls for insects and birds, wood piles for beetles, nest boxes for birds, and in ecological networks can increase permeability of wildlife in new development through biodiversity enhancements.

Grand Union Canal forms a strategic wildlife corridor along northern boundary of Tr-h1 (see Adopted Core Strategy 2013 Tring Place Strategy). We recommend that the trees/bushes/hedges/scrub along this boundary be retained with a buffer of 10 metres.

Tr-h1 and Tr-h2 have urban wildlife corridors along Marshcroft Lane. The banks/ditches/scrub etc along this corridor should be retained wherever possible. If any are removed/destroyed then biodiversity offsetting should be undertaken on the development sites concerned. Options include new hedges of locally indigenous shrubs; orchard of traditional Hertfordshire apples and plums; wildlife ponds.

Tr-h3 has an urban wildlife corridor along Bulbourne Road. Any removal of this corridor, eg hedging removal should be subject to biodiversity offsite on site, eg as continuous a hedge as possible to connect with existing hedges using indigenous shrubs, eg guelder rose, spindle, field maple.

Tr-h5 has a local wildlife site. We would recommend retention of this site, and connection of it to existing hedges. Existing field hedges should be retained or have replacement hedges of indigenous shrubs.

Tr-h6 northern boundary is a canal which is a strategic wildlife corridor. This boundary should remain undisturbed by development, with additional planting to fill gaps, and have a 10-metre buffer zone.

Include files	
Number	Question 31
ID	LPIO12390
Full Name	ms rona morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As before, great principles but how does building on Green Belt around Berkhamsted possibly comply.

Include files	
Number	Question 31
ID	LPIO12446
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>Standard BRAG response to Question 31. Please note full document is attached to Question 46.</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12494
Full Name	Meenakshi Jefferys
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. 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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
<p>Include files</p>	
<p>Number</p>	<p>Question 31</p>
<p>ID</p>	<p>LP1012541</p>
<p>Full Name</p>	<p>Mrs Jane Barrett</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>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>Standard BRAG response for Question 31. Please note full document is attached to Question 46.</p>

	<p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12591
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions

	<ul style="list-style-type: none"> Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12640
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12689
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12737
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12786
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions

	<ul style="list-style-type: none"> Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12833
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12881
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO12935
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LP1012984
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without

	<p>generating additional car journeys and adding to emissions</p> <ul style="list-style-type: none"> • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained.
Include files	
Number	Question 31
ID	LPIO13033
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>...</p> <p>BRAG response to question 31 below (full BRAG response see question 46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13086

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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13134
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13408
Full Name	Mr Alan Mitchell
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 31
ID	LPIO13409
Full Name	Mrs Christine Mitchell
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 31
ID	LPIO13468

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><i>We don't understand how taking away land from the green belt contributes to conserving the 'Green Infrastructure'</i></p> <p><i>Hemel Hempstead has green areas between housing areas – Berkhamsted has nothing like that – in fact the cemetery is considered to be one of the significant green areas since there are so few!</i></p> <p><i>It seems you do not know what types of open space need to be protected?</i></p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13516
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13571
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13624
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space

	<ul style="list-style-type: none"> Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13686
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31

ID	LPIO13751
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13801
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	The Berkhamsted Residents Action Group (BRAG) has 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>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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO13857
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p>

	<ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14026
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained

Include files	
Number	Question 31
ID	LPIO14075
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14123
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>..</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14174
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?

	<ul style="list-style-type: none"> • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14313
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>It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.</p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p>
Include files	
Number	Question 31
ID	LPIO14317
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 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 31 (please note full document is attached to Q46)</p>

	<p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14403
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions

	<ul style="list-style-type: none"> Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14452
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14501
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14696
Full Name	Mrs Gillian Bailey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In Berkhamsted there is far less green space than in other local towns. Existing green infrastructure must be improved before any new plans are considered.
Include files	
Number	Question 31
ID	LPIO14778
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14850
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO14896
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>Tring is surrounded by the Chilterns A.O.N.B. and any open land between the settlement boundary and the A.O.N.B. (all Green Belt) is part of the setting of the A.O.N.B. This is an intrinsic factor in the character and community of Tring. Its protection is vital.</p> <p>As worded paragraph 9.3.4 is an open-ended statement allowing fundamental changes of policy after the consultation. Updating evidence and determining policy in light of the most recent information is laudable, but must only be adopted after through scrutiny and before submission of the Plan.</p>

Include files	
Number	Question 31
ID	LPIO14952
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15003
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15051
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LP1015114
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"> • It is essential that new development is supported by appropriate levels of new infrastructure and this is key to ensuring the sustainability of development as it takes place. We agree with the Council’s identification of ‘physical’, ‘social’ and ‘green’ infrastructure groupings. We also agree with the Council on the importance of timely and phased provision of infrastructure, so this is provided where and when it is needed. We also agree with the Council that larger scale development is better able to underpin the delivery of infrastructure requirements because of the efficiency of scale that can be achieved. However, the phasing of infrastructure should be assessed carefully to ensure that any planning policy requirement is consistent with viability modelling so that the overall delivery of proposals is not undermined by excessive requirements early on in the phasing of development. <p>Infrastructure Needs for Different Forms of Development</p> <ul style="list-style-type: none"> • The Council sets out following 9.3.4 of the consultation document, a table identifying the level of infrastructure to be provided for various key

	<p>areas of infrastructure provision, ranging from education provision, through to health provision and green infrastructure, relative to increasing scales of development. The development of a table of this nature is useful as a guide to the levels of infrastructure that will be required in any given instance. However, it is important that the circumstances of each case are assessed on merit, as this may identify that there are greater deficiencies of some types of infrastructure relative to others. In such circumstances, it is important that funding is focussed where it is needed and under provision of infrastructure is avoided to ensure for an appropriate package of infrastructure measures.</p>
Include files	
Number	Question 31
ID	LPIO15279
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 31 (please note full document is attached to Q46)</p> <p>Question 31: Do you think that we have covered all issues relating to green infrastructure?</p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space

	<ul style="list-style-type: none"> Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15330
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? Concreting over a large area and providing a play area or pitch does not constitute providing open space Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15379
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15441
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15489
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> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play

	<p>here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?</p> <ul style="list-style-type: none"> • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15545
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained

Include files	
Number	Question 31
ID	LPIO15594
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15661
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO15684
Full Name	Mr Patrick Barr
Company / Organisation	Tring Hockey Club
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 31
ID	LPIO15720
Full Name	Mark Pawlett
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>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>In particular I am concerned regarding the lack of strategic thinking that the DBC proposes in respect of town planning. It is my view that affordable housing is required, however it is critical that any development effectively considers ecosystem services and biodiversity provided by Green Belt space in the area. I am concerned that the wider societal issues regarding the loss of green space in general are not effectively being considered. Town planning in Tring at the moment seems to be ignoring that there are proven causal links between green space and mental health.</p> <p>GFRA Response to Question 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 31</p>
<p>ID</p>	<p>LPIO15768</p>
<p>Full Name</p>	<p>Maria & Colin Sturges</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>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 31, full document attached to question 46</p>

	<p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LP1015815
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	

Number	Question 31
ID	LPIO15893
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.ii Throughout the LP, DBC makes correlation between release of Green Belt and improvements to infrastructure. Infrastructure within the Borough eg. roads, education, healthcare, is already under considerable pressure from the existing population. CCG does not accept that such infrastructure improvements should be dependent upon release of Green Belt.</p> <p>1.iii. We accept that in some circumstances planning consent for housing may be granted dependent upon developers contributing to and/or providing related infrastructure to support an increased population. However we find that for the growth proposed in the LP, granting such planning consent may well be self-defeating. CCG remains unconvinced that such improvements would satisfactorily meet needs of both the existing and future communities.</p>
Include files	
Number	Question 31
ID	LPIO15901
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>2.xi. CCG does not find creation of Suitable Alternative Natural Greenspaces (SANGs) acceptable replications of an existing, naturally beautiful, green and tranquil open landscape. Wildlife corridors, habitats and important markers such as hedgerows which have established over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.</p> <p>2.xii. Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding,</p>

	dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificial, man-made green space.
Include files	
Number	Question 31
ID	LPIO15915
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>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
Include files	
Number	Question 31
ID	LPIO16073
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p>

	At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO16127
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO16186
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO16243
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>Furthermore, the infrastructure in Tring is already stretched (as all local people know) in terms of the town centre traffic, parking and schools. This cannot fully be addressed by the options presented in the consultation.</p> <p>GFRA Response to Question 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>

Include files	
Number	Question 31
ID	LPIO16304
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO16366
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p>

	At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO16413
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO16479

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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO16500
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>CCG response to question 31 full document attached to question 46</p> <p>1.ii Throughout the LP, DBC makes correlation between release of Green Belt and improvements to infrastructure. Infrastructure within the Borough eg. roads, education, healthcare, is already under considerable pressure from the existing population. CCG does not accept that such infrastructure improvements should be dependent upon release of Green Belt.</p> <p>1.iii. We accept that in some circumstances planning consent for housing may be granted dependent upon developers contributing to and/or providing related infrastructure to support an increased population.</p>

	However we find that for the growth proposed in the LP, granting such planning consent may well be self-defeating. CCG remains unconvinced that such improvements would satisfactorily meet needs of both the existing and future communities.
Include files	
Number	Question 31
ID	LPIO16508
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>..</p> <p>CCG response to question 31 full document attached to question 46</p> <p>2.xi. CCG does not find creation of Suitable Alternative Natural Greenspaces (SANGs) acceptable replications of an existing, naturally beautiful, green and tranquil open landscape. Wildlife corridors, habitats and important markers such as hedgerows which have established over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.</p> <p>2.xii. Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding, dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificial, man-made green space.</p> <p>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p>

	6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.
Include files	
Number	Question 31
ID	LPIO16522
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>...</p> <p>CCG response to question 31 full document attached to question 46</p> <p>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
Include files	
Number	Question 31
ID	LPIO16555
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 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p>

	<p>No</p> <ul style="list-style-type: none"> . Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply . Concreting over a large area and providing a play area or pitch does not constitute providing open space . Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions . Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO16691
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	Yes
Your response - Please add your response here	<p>Yes. We are pleased to see reference to the historic environment within a GI context in the consultation document and we support the consideration of Green Infrastructure (GI) at the strategic level in the emerging Local Plan. However the rationale could be improved upon. Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider ‘multi-functional’ spaces only in terms of the natural environment, health and recreation. It may be helpful to make further reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so</p>

	that they continue to serve as high quality places which remain beneficial in the long term.
Include files	
Number	Question 31
ID	LPIO16722
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	Issues 22 to 24 – it is considered essential that all growth delivered through the local plan is accompanied by an appropriate level of infrastructure, be it education, healthcare provision or new roads. It is also essential that growth delivered within Dacorum does not detrimentally impact upon Central Bedfordshire or its residents. CBC looks forward to continued engagement with the Borough Council in relation to the identification of any cross boundary infrastructure provision.
Include files	
Number	Question 31
ID	LPIO16798
Full Name	Terry Godber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Whilst there should be sports provision co-located with any new school, please ensure that each new housing scheme also allocates space for infant play areas and for public sports fields proportionate to their scale. Perhaps unlike retail it's entirely appropriate that such provisions are diversified where they can have a close proximity to those who may have needs to use them on a regular basis.</p> <p>Can you undertake to ensure that proportionate public play and sports areas will be included with all development schemes?</p>
Include files	
Number	Question 31
ID	LPIO16838

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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO16906
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered</p>

	that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO16994
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17051
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be</p>

	<p>justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17108
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17145
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	I fully concur with the comments attached from BRAG.

	<p>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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO17206
Full Name	Watford Borough Council
Company / Organisation	
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 31.</p> <p>Protection and enhancement of the green infrastructure network is an issue that can also be considered at the local and regional level to benefit Dacorum and neighbouring areas as the new Local Plan is implemented. This cross boundary issue is referred to in section 4 but green infrastructure could usefully be cross referenced in this context. Dacorum will have to consider locally specific issues, however, as the Dacorum Local Plan is progressed, as well as those of neighbouring authorities, it could be useful to consider if or how local approaches to open space provision are complimentary or divergent. This would identify how a</p>

	coordinated approach to delivery could be implemented, particularly where development may take place near local authority administrative boundaries.
Include files	
Number	Question 31
ID	LPIO17242
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions <p>Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained</p>
Include files	
Number	Question 31
ID	LPIO17299
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO17355
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p>

	At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO17407
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 31 below (copy of full response attached to question 46)</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space
Include files	
Number	Question 31
ID	LPIO17462
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17521
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>

Include files	
Number	Question 31
ID	LPIO17569
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 31 below (copy of full response attached to question 46)</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space
Include files	
Number	Question 31
ID	LPIO17628
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17702
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	

Number	Question 31
ID	LPIO17751
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 31 below - full document attached to Question 46</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more. • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space.
Include files	
Number	Question 31
ID	LPIO17807
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17865
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17923
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 plants for additional building in the Tring area.</p> <p>GFRA Response to Question 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO17973
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	The issues are covered but the track record of Dacorum providing these facilities is poor. The junior football and rugby clubs in Tring have been looking for sites to expand for years.
Include files	
Number	Question 31
ID	LPIO18032
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	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

	<p>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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO18103
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>More work is required to evaluate the infrastructure required to support the different levels of housing development, for example, transport and congestion modelling</p> <p>GFRA Response to Question 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	

Number	Question 31
ID	LPIO18160
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO18217
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be</p>

	protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO18270
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18330
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO18498
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 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within

	the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18545
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18591
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18637
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 think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more • It has already been suggested that a number of green spaces within the town are grass-creted over

	to provide parking, thus reducing even further our inadequate green space
Include files	
Number	Question 31
ID	LPIO18684
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18730
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18776
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 think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?

	<ul style="list-style-type: none"> • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space
Include files	
Number	Question 31
ID	LPIO18824
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered

	for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18872
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>...</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18918
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO18996
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt</p>

	<p>land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19059
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"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more. • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space.
Include files	
Number	Question 31
ID	LPIO19116
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 too excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19174
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure.</p>

	As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO19232
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19289
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</p>

	<p>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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19343
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply?

	<ul style="list-style-type: none"> • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO19392
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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained

Include files	
Number	Question 31
ID	LPIO19439
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 31</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more. • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space.
Include files	
Number	Question 31
ID	LPIO19494
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	I would like to endorse the findings of the attached report prepared for the Grove Fields Residents Association.

	<p>GFRA Response to Question 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure</p>
Include files	
Number	Question 31
ID	LPIO19551
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19609
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19665
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered</p>

	that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO19724
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19778
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 31</p>

	<p>Do you think that we have covered all issues relating to green infrastructure?</p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more. • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space.
Include files	
Number	Question 31
ID	LP1019798
Full Name	Miss Hannah Moynehan
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>People in Berkhamsted, Northchurch and Tring are sadly being let down yet again by the Conservative council. The draft Dacorum Local Plan not only sacrifices precious green belt, it also completely fails to show how the council is going to deliver affordable housing or address the severe lack of investment in supporting infrastructure.</i></p> <p><i>At a very well attended meeting at the Rising Sun, Berkhamsted on 6th December, local Labour Party members from Berkhamsted, Northchurch and Tring therefore resolved to reject Dacorum's draft Local Plan and the Options proposed which would all mean the sacrifice of green belt land. We are not prepared to see green belt lost so that land speculators make vast profits from yet more £1 million homes. Instead, we are committed to campaign for a plan which is genuinely designed to meet the needs of this community. We believe people want to see green belt only allocated for development if guaranteed that more than 50% will be genuinely affordable housing (and at least half of that social housing). Our own young people, as well as the carers, teachers and NHS staff our families depend on, can no longer afford to buy or even rent around here. We are very short of suitable and affordable supported</i></p>

	<p><i>housing for older people. Yet none of these needs are addressed by the draft plan.</i></p> <p><i>Above all, we need to see a thorough assessment of the impact on this part of Dacorum's creaking infrastructure (public transport, cycling and walking, roads, parking, schools and playgrounds, GPs, sewers, water and utilities). It must start with the impact from recent existing housing developments, as well as the demands from any further building. So we are calling for the council to commit to active planning to meet those needs ahead of further development. And any future new housing must be developed sustainably meeting the highest environmental standards and avoid worsening traffic congestion, air pollution and road safety in Berkhamsted, Northchurch and Tring.</i></p>
Include files	
Number	Question 31
ID	LPIO19847
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19931
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO19988
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	

Number	Question 31
ID	LPIO20045
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO20102
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>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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt</p>

	<p>land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO20160
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO20217
Full Name	Dianne Pilkington
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>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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 31</p>
<p>ID</p>	<p>LPIO20265</p>
<p>Full Name</p>	<p>Mr Peter Brown</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>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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p>

	<ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO20320
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p>

	At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO20378
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO20426
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	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>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO20487
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green</p>

	Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure
Include files	
Number	Question 31
ID	LPIO20535
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained

	<p>Berkhamsted Citizens response</p> <p><i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more • It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space
Include files	
Number	Question 31
ID	LPIO20582
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 think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more • It has already been suggested that a number of green spaces within the town are grass-creted over

	to provide parking, thus reducing even further our inadequate green space
Include files	
Number	Question 31
ID	LPIO20609
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>For Dunsley Farm both scenarios featured in the call for sites representations provide a linear park at least 5ha in area following public footpath 56 to the London Road frontage of the site to the south</p> <p>The opportunities to integrate green infrastructure with any other land uses, including the edge of the employment area, associated with any school and school playing fields, and in terms of any reducing density of residential development on the urban edge, would all be capable of further discussion with the LPA.</p>
Include files	
Number	Question 31
ID	LPIO20654
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered</p>

	that the Council have sufficiently covered issues in relation to green infrastructure.
Include files	
Number	Question 31
ID	LPIO20710
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO20758
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>Tring is surrounded by the Chilterns A.O.N.B. and any open land between the settlement boundary and the A.O.N.B. (all Green Belt) is part of the setting of the A.O.N.B. This is an intrinsic factor in the character and community of Tring. Its protection is vital.</p> <p>As worded paragraph 9.3.4 is an open-ended statement allowing fundamental changes of policy after the consultation. Updating evidence and determining policy in light of the most recent information is laudable, but must only be adopted after through scrutiny and before submission of the Plan.</p>
Include files	
Number	Question 31
ID	LPIO20806
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	Yes, in principle
Include files	
Number	Question 31
ID	LPIO20852
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space

	<ul style="list-style-type: none"> Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO20872
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 key matters. Please refer to the CCG submission for my full response.</p> <p>Chiltern Conservation Group response below</p> <p>1.ii Throughout the LP, DBC makes correlation between release of Green Belt and improvements to infrastructure. Infrastructure within the Borough eg. roads, education, healthcare, is already under considerable pressure from the existing population. CCG does not accept that such infrastructure improvements should be dependent upon release of Green Belt.</p> <p>1.iii. We accept that in some circumstances planning consent for housing may be granted dependent upon developers contributing to and/or providing related infrastructure to support an increased population. However we find that for the growth proposed in the LP, granting such planning consent may well be self-defeating. CCG remains unconvinced that such improvements would satisfactorily meet needs of both the existing and future communities.</p>
Include files	
Number	Question 31
ID	LPIO20880

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 key matters. Please refer to the CCG submission for my full response.</p> <p>Chiltern Conservation Group response below</p> <p>2.xi. CCG does not find creation of Suitable Alternative Natural Greenspaces (SANGs) acceptable replications of an existing, naturally beautiful, green and tranquil open landscape. Wildlife corridors, habitats and important markers such as hedgerows which have established over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.</p> <p>2.xii. Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding, dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificial, man-made green space.</p>
Include files	
Number	Question 31
ID	LP1020894
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</p>

	<p>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 key matters. Please refer to the CCG submission for my full response.</p> <p>Chiltern Conservation Group response below</p> <p>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
Include files	
Number	Question 31
ID	LPIO20928
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is

	made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO20983
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>Q31. BRAG.</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained <p>Berkhamsted Town Council response</p>

	<p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.</p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p>
Include files	
Number	Question 31
ID	LPIO21068
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO21133
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LP1021209
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 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • I agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31

ID	LPIO21258
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>This section should recognise the importance of ecological corridors and networks in green infrastructure. It could reference the Lawton report (http://www.gov.uk/government/uploads/attachment_data/file/311406/lawton-report-2015.pdf) and also the Chilterns AONB Management Plan's biodiversity aim: "Enhance ecological networks so that they are bigger, better, more resilient, joined up and dynamic" (see http://www.chilternsaonb.org/conservation-board/management-plan.html). With much of Dacorum's population on the doorstep of the Chilterns AONB, connections into the vast public rights of way network of the Chilterns (including the Ridgeway National Trail) should be cherished and invested in.</p>
Include files	
Number	Question 31
ID	LPIO21276
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.ii Throughout the LP, DBC makes correlation between release of Green Belt and improvements to infrastructure. Infrastructure within the Borough eg. roads, education, healthcare, is already under considerable pressure from the existing population. CCG does not accept that such infrastructure improvements should be dependent upon release of Green Belt.</p> <p>1.iii. We accept that in some circumstances planning consent for housing may be granted dependent upon developers contributing to and/or providing related infrastructure to support an increased population.</p>

	However we find that for the growth proposed in the LP, granting such planning consent may well be self-defeating. CCG remains unconvinced that such improvements would satisfactorily meet needs of both the existing and future communities.
Include files	
Number	Question 31
ID	LPIO21284
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>2.xi. CCG does not find creation of Suitable Alternative Natural Greenspaces (SANGs) acceptable replications of an existing, naturally beautiful, green and tranquil open landscape. Wildlife corridors, habitats and important markers such as hedgerows which have established over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.</p> <p>2.xii. Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding, dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificial, man-made green space.</p>
Include files	
Number	Question 31
ID	LPIO21298
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>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
Include files	
Number	Question 31
ID	LPIO21332
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 X (please note full document is attached to Q46)</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered

	for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO21378
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 X (please note full document is attached to Q46)</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO21558
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 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that "the quality of green spaces in Dacorum attracts people and families to live, work and play here" – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions <p>Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained</p>
Include files	
Number	Question 31
ID	LPIO21615
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 31, full document attached to question 46</p> <p>It is our opinion that green infrastructure can only be possibly met by the Council on the basis that Green Belt land is protected from development unless it can be justifiably identified to be required under exceptional circumstances.</p> <p>At this point in time there is a premature consideration of unlocking Green Belt land that should otherwise be protected under the approach to Green infrastructure. As such until such time when the risk posed to Green Belt land is significantly reduced then it is not considered that the Council have sufficiently covered issues in relation to green infrastructure.</p>
Include files	
Number	Question 31
ID	LPIO21671
Full Name	Mr Andy Criddle
Company / Organisation	Dacorum Sports Network
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 submission on behalf of Tring Sports Forum (TSF) in response to the Local Plan Issues and Consultation. This submission is made by TSF on behalf of and with the full agreement of our 17 local community sports clubs in Tring who have a combined membership of well over 4000 people. The submission includes a detailed indication of the current and future sporting needs of the town and how these can be accommodated within the essential infrastructure development that will be needed to support the proposed housing/population growth. We have further data and detail available to explain and justify the proposals within our submission (including the indicative plan we have supplied for the allocation of space for sports and leisure). We suggest and request a meeting with Dacorum Borough Council (DBC) Planning Department's officers to discuss this data and how the required sporting facilities can be effectively integrated, in such a way that they can be sustainably managed by the local community, before the Pre-Submission (Publication) Plan is drafted over the coming months.</p> <p>The facilities required have been calculated based on:</p> <ul style="list-style-type: none"> • Dacorum Borough's own evidence base including the Dacorum Playing Pitch Strategy & Action Plan 2015-2025 • Awareness of the current and projected facility needs of local community clubs in Tring • The scale of expected population growth as indicated in DBC's Issues and Options Consultation document

- Tring Town Council's own consultation response and their expressed preferences for development in Tring
- Herts. County Councils own proposals and submissions relating to Tring

Our submission and indicative plan offer a number of additional benefits beyond just the provision of extra playing facilities for community clubs. These include:

- A green buffer zone between any new development on Tr-h5 and current residential properties on Station Road and Damask Close.
- A leisure and fitness trail which would provide not only an amenity for all ages (cycling, walking, jogging, fitness stations etc.) but also a safe access route between the Town and local amenities, including Sports Clubs, as well as any developments on Tr-h5 such as a school, housing and/or business parks
- More than 200 additional car parking spaces for the sports facilities either side of Cow Lane to solve current and likely to be increased parking problems, traffic and safety issues in this area
- Ecological maintenance of all existing hedgerows
- Integration of an extended commercial area including a Business Park to provide additional employment opportunities as well as a potential site for a petrol station

Our indicative plan is provided as a starting point for discussion on how the infrastructure requirements (especially for sport and leisure) can be integrated into the local plan and also the best site solution for the Town in terms of housing and infrastructure development. Our suggestions for the development of Tr-h5 provide potential options for either new housing (for up to circa 300 new homes) or additional secondary and primary schools, or a new larger school to replace the existing Tring School (the site of which at Mortimer Hill could then be developed for housing – with integrated green space – for circa 300 new homes).

We look forward to being able to discuss these proposals and options with DBC Planning Officers and to working closely with them to ensure that sporting facility needs are fully and sustainably met within the finalised plan.

Submission

- 1 Tring has a thriving sporting community with participation numbers way in excess of towns of a similar size. The town is home to Dacorum's leading cricket, rugby, and hockey clubs, as well as the second biggest junior football club. It is well documented that many of the local community clubs are already in desperate need of extra playing space and facilities to meet current demand¹. With the resultant increase in population indicated in all the options identified for the Local Plan to 2036, the need for even more playing space and additional facilities should be an

essential part of the infrastructure development for Tring to support all the options in the plan.

- 2 The additional playing facilities required can be developed and sustainably managed by existing community clubs. These clubs are all well managed, and already working closely together with each other and local schools, to maximise sporting opportunity for local adults and children. These partnerships include regular sharing of facilities between clubs, and between schools and clubs, to maximise facility utilisation.
- 3 In order to make any additional playing facilities viable, shareable, sustainable and manageable by local community clubs, and to ensure their maximised utilisation, they will need to be:

A) Contiguous and adjacent to existing relevant club's facilities

(ad hoc playing fields that are detached from existing facilities are not viable or manageable by local community clubs and become unsustainable and liable to abuse - e.g. vandalism and damage)

B) Adjacent to any new secondary school that may be planned

C) Of sufficient playing space to not only meet demand but also to be in line with the requirements set out by the relevant National Governing Bodies

4. To meet both current demand¹ and the potential increase in playing numbers between now and 2036, the area required for additional playing facilities has been calculated as being 91 ha. This is based on inclusion of:

- An additional floodlit ATP – as defined in evidence¹ is required for hockey in Dacorum and as the only hockey clubs in Dacorum are both in Tring, demand for this new pitch should be met in the Tring area and as soon as possible.
- Space to allow for expansion of the existing combined sports hub located at Tring Park CC (adjacent to site Tr-h5). This hub is the home to Tring Cricket, Tennis and Hockey Clubs all of which already have need for additional playing facilities to meet current demand and will require additional playing space to meet increased demand resulting from the housing growth. This may include additional tennis courts, an additional cricket pitch and potentially a further hockey ATP.
- Additional junior and senior football pitches in a shared football hub that will include: 2 x pitches each for age groups U6 to U16; 2 x Senior pitches; 1 x 3G training area; clubhouse with changing rooms; car parking; and linked to school playing fields for shared use and to cater for expanding demand

NB By relocating some existing football pitches at Cow Lane to this new hub would release space required for identified¹ expansion of Rugby facilities/pitches

- 1 Given the points raised in (3) above, the site at Tr-h5 (Dunsley Farm) provides the best and most viable opportunity for the location of additional sporting facilities. This site becomes even more appropriate for the needs of the town if a new

secondary school were to be built, as this site could provide for shared use of new playing facilities. If a new school is not required on this site then approximately 300 houses could be accommodated instead while still providing the additional sports and leisure space required by the town.

A plan has been supplied with this document to indicate how the new sporting facilities could be integrated as part of a mixed-use development of Tr-h5 - including:

- 1 additional business units
- 2 a new secondary school (if required) including school playing fields – or housing in its place
- 3 a football hub at the Cow Lane end of the site
- 4 the hockey ATP and expansion space for the Tring Cricket Club multi-sports hub at the town end of the site

Tring Sports Forum, representing the Sports Clubs listed below, strongly recommend the development of the TR-h5 site (as indicated above). This site can supply much of the infrastructure needed to support the proposed housing growth options for Tring – as well as meeting the current and urgent need for additional sporting facilities in Tring.

Participating clubs

Tring Sports Forum represents the following clubs with a total playing and social membership in excess of 4000 (including more than 1500 junior members):

- Tring Anglers
- Tring Athletic Football Club
- Tring Bowls Club
- Tring Hockey Club
- Tring Lawn Tennis Club
- Tring Park Cricket Club
- Tring Rugby Union Football Club
- Tring Running Club
- Tring Squash Club
- Tring Swimming Club
- Tring Table Tennis Club
- Tring Tornadoes Junior Football Club
- Tring Tornadoes Netball Club
- Tring Tornadoes Futsal Club
- Tring Town Football Club
- Dacorum Back to Netball (Tring Group)
- Chiltern Canoe Club

[1]

[1] Dacorum Playing Pitch Strategy & Action Plan 2015 - 2025 - Evidence in support of plan

Number	Question 31
ID	LPIO21798
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"> Physical, social and green infrastructure are the three categories set out in the issues and options. The scale required in HHTC will depend on the amount of new development that comes forward. Green infrastructure in HHTC has seen improvements through the riverside public realm enhancements. Further green links and public realm enhancement could strengthen the choice of sustainable transport options and town centre permeability, alongside cycle and pedestrian routes between the key public transport
Include files	
Number	Question 31
ID	LPIO21810
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>With regards to the identified issues relating to green infrastructure, we believe that the Local Plan could strengthen its position on protecting and providing open space through an explicit recognition of:</p> <ul style="list-style-type: none"> its value in promoting physical activity and mental wellbeing, and its role in encouraging and enabling active/sustainable travel
Include files	
Number	Question 31
ID	LPIO21898
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"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO21934
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</p>

	<p>unique perceptive on what made the town attractive and what is now at risk.</p> <p>BRAG response to Question 31 (please note full document is attached to Q46)</p> <p>Question 31 <i>Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply? • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO21966
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>It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.</p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions.</p>
Include files	
Number	Question 31
ID	LPIO22044
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	No
Your response - Please add your response here	<p>This answer is in relation to the three questions 29,30,31.</p> <p>Some relevant infrastructure issues have been touched upon briefly in the Issues and Options document. It is expected that more detailed proposals will emerge in later stages of the emerging Local Plan, particularly in response to the progress of the Local Transport Plan.</p> <p>Assumptions as to infrastructure requirements will need to be underpinned by robust and up-to-date evidence, including the most recent economic and housing growth figures. As discussed elsewhere, the appropriate growth figures are up in the air at this moment in time due to awaiting confirmation from the Government as to its proposed approach to determining dwelling requirements.</p> <p>Once a growth option has been chosen and sites have been selected for removal from the Green Belt, full consideration in the emerging Local Plan of specific infrastructure requirements and how they are proposed to be delivered is expected. It is recommended that the Council updates its CIL charging schedule in line with the emerging Local Plan.</p> <p>It is noted that the proposed redevelopment of land at New Mill, Tring has potential to contribute towards the delivery of a north / south link road connecting Bulbourne Road with Station Road, as well as other infrastructure including new open space, local shop, accommodation for new healthcare facilities, a new primary school and financial contributions towards secondary school provision. Gallagher Estates has commenced enquiries with stakeholders to obtain more detailed information with regard to infrastructure requirements at the local level and will continue to do so to further demonstrate the deliverability of the site as a available, suitable and achievable.</p>
Include files	
Number	Question 31
ID	LP1022080
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

Green Infrastructure is an important part of the character of Kings Langley and provides a strong sense of place. The approach needs to focus on protecting existing green infrastructure and potentially creating new green infrastructure.

Green Infrastructure around Kings Langley is important not only for preserving the natural setting and historic character of the village but to keep the distinct character of the village separate from Hemel Hempstead to the north and Hunton Bridge / Abbots Langley / Leavesden to the south. Both gaps are extremely fragile, and their integrity is essential for protection against coalescence both physically and perceptually. Consequently, the KL&DRA would like to see the following areas designated as Strategic Gaps:

- Land to the north and north west of the village (to the north of Rectory Farm and between the village edge northwards taking in Rucklers Lane and Shendish); and
- Land to the south of Kings Langley at Wayside

These additional designations should be considered in the Council's approach to Green Infrastructure. Please see Appendix C for a map identifying the areas proposed for designation as Strategic Gaps within the emerging New Local Plan.

In addition to the above, KL&DRA wish to see the area at Rectory Farm identified as a strategic open space. There is also scope, to improve the green infrastructure to the north of Rectory Farm between the village edge and Gaywood Park. This area already contains the sports pitches of Kings Langley Football Club as an important community recreational facility, but it could be further enhanced through the creation of a green wildlife corridor along the canal and River Gade. Such improvements could be facilitated through development contributions, should the Rectory Farm brownfield footprint be allocated for residential redevelopment and should be made explicit in any policy criteria attached to such redevelopment.

QUESTION 31 Green Infrastructure - Summary Representation and Response Sought:

KL&DRA would like to see the Green Infrastructure network and resource enhanced around Kings Langley:

i) Land to the north and north west of the village (at Rectory Farm and between the village edge northwards taking in Rucklers Lane and Shendish) as a Strategic Gap to protect against coalescence with Hemel Hempstead; and

ii) Land to the south of Kings Langley at Wayside Farm as a Strategic Gap to protect against coalescence with the M25 / Hunton Bridge / Abbots Langley / Leavesden.

These areas are identified on the Map at Appendix C.

iii) Land on the periphery of the village at Rectory Farm should be identified as a strategic open space with a green wildlife corridor identified along the canal and River Gade. A policy requirement for the enhancement of Green Infrastructure should be placed on any redevelopment of the brownfield element of Rectory Farm.

Include files	Jane Terry - REPS - Appendicies A B C - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Appendicies A B C.pdf
Number	Question 31
ID	LPIO22145
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 31
ID	LPIO22188
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 31
ID	LPIO22233
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 31
ID	LPIO22512
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"> • Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply • Concreting over a large area and providing a play area or pitch does not constitute providing open space • Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions • Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained
Include files	
Number	Question 31
ID	LPIO22562
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>It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.</p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p>
Include files	
Number	Question 31
ID	LPIO22584
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 agree with the Council that it is important to provide open space alongside future housing growth. However, it is important to recognise that in respect of the proposed housing allocations, some of which offer important opportunities to seek to address <u>deficiencies</u> in open space, which is a significant benefit for existing residents. This is an important issue when deciding which sites should be allocated for housing.</p> <p>For example, the proposed site at Haslam Fields (Site Ref Be-h2) provides an opportunity for some 2.76 hectares of open space to be provided on the land to the rear. The Dacorum Open Space Study (March 2008) shows that there is a deficit of natural green space in this area (the area is well served by playing pitches). The proposed scheme could provide a significant new area of natural space to address the deficit that exists locally, and we consider that this would be of substantial benefit to people living in the local area.</p> <p>Furthermore, the provision of some 2.76 hectares of open space, with potential for a wildlife site/nature reserve/walking field if appropriate, is very significant considering that the site has an indicative capacity of only 80-100 dwellings. The table on page 82 of the Issues and Options consultation advises that housing sites of 500 dwellings (5 times more than proposed at Haslam Fields), only require 1.6 hectares of open space, which is far less than would be provided at Haslam Fields.</p> <p>The delivery of the Haslam Fields site would result in far greater public benefits in respect of the provision of open space than other sites, where opportunities for provision are more limited.</p> <p>It is considered that the emerging Local Plan should be amended to give greater weight to the allocation of sites that offer opportunities to address deficiencies in open space provision.</p>
Include files	
Number	Question 31
ID	LPIO22632
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>It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.</p> <p>Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions</p>
Include files	
Number	Question 31
ID	LPIO22709
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 31 – Do you think that we have covered all issues relating to green infrastructure?</i></p> <p>We welcome the recognition given to green infrastructure throughout this document and hopes this will continue through stages of plan preparation.</p> <p>The Local Plan should include a strategic GI policy. There should be reference to the Hertfordshire GI Strategy, Dacorum GI Strategy and how these translate into local projects. The delivery of GI should be secured through planning obligations and a priority for delivery in Infrastructure Delivery Plans.</p> <p>The approach should reflect the key principles of GI that include the delivery of locally distinct and high quality places, multifunctionality (making best use of the land), connectivity for people and wildlife, the delivery of multiple environmental, social and economic benefits (e.g. improved health and wellbeing/security, ecosystem services, biodiversity, effective natural resource management (e.g. air/water/soil regulation)).</p> <p>HCC, with the Herts Planning Group (HPG) is currently progressing work on Green Infrastructure (GI) in Hertfordshire. The aims of this work include:</p>

- To provide an effective approach to facilitating the delivery of GI through the planning process in Hertfordshire.
- In accordance with the Duty to Co-operate, to improve collaboration on GI across the districts, with HCC and relevant stakeholders.
- To promote and raise the profile of GI, to bring it back into the mainstream – integrating planning and green space delivery in Hertfordshire, raising awareness of the benefits of GI and ensuring that GI is acknowledged and understood at officer, Member and corporate level, across portfolio holders.
- To increase the recognition and role of GI as part of economic development in Hertfordshire.
- To provide a practical mechanism to maximise delivery of GI and has value to developers, as an integral part of future planning proposals.

Dacorum officers have already been consulted; directly on a one to one basis and as part of the HPG Development Plans and Hertfordshire Landscape and Green Infrastructure Group (HLGIG). It would be useful for Herts mere to consider this project when progressing draft policies in the new Local Plan.

The Natural, Historic & Built Environment Advisory Team believes that although paragraph 9.3.1 notes that the historic environment may need more protection and enhancement through the local plan, the definition of Green Infrastructure in this section should include the historic environment. This section does not in its current form.

In reference to paragraph 9.3.4, there is no use of the term Accessible Natural Greenspace or any Standard measure for this (ANGST). Whilst this was first published in 2003, it still provides a valuable guide to defining what natural greenspace is and expectations of its delivery.

This section should also place more emphasis on management of such areas, particularly where ecology is expected to benefit given the nature of the management such areas may require, in contrast to more straightforward maintenance regimes.

There should also be reference to use of S106 management agreements resulting from development in order to help deliver sites and appropriate management through the planning process. Without any such mechanism, any planning gain will have limited effect if the benefits cannot subsequently be maintained.

Include files	
Number	Question 31
ID	LPIO22817
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	<p>Proposals for a large number of new homes at Rectory Farm would involve permanently removing one of the few remaining untouched wildlife corridors bordering the River Gade/Grand Union Canal.</p> <p>Similarly, at the southern end of Kings Langley, building offices and/or homes at Wayside Farm would remove more green space between the village and M25.</p> <p>Removing these green spaces would destroy the sense of Kings Langley as a distinct village community, separate from Hemel Hempstead.</p> <p>It is essential that we protect the green infrastructure in and around Kings Langley and Shendish which is part of our historic character.</p> <p>In law, Green belt can only be changed with the support of local people</p>
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	313
Filtered Respondents	303
Questions	<p>Question 32</p> <p>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</p> <p>Yes / No</p> <p><i>If no, please explain what additional mechanisms you would like to see and why. Where possible support your answer with reference to any evidence.</i></p>
Filter	<i>(none)</i>
Consultation Point(s)	ID-4764269-QUESTION-32
Pivot	<i>(none)</i>
Document Name	Question 32 - Summary Report
Created on	2019-04-23 08:55:19
Created by	Strategic Planning Admin

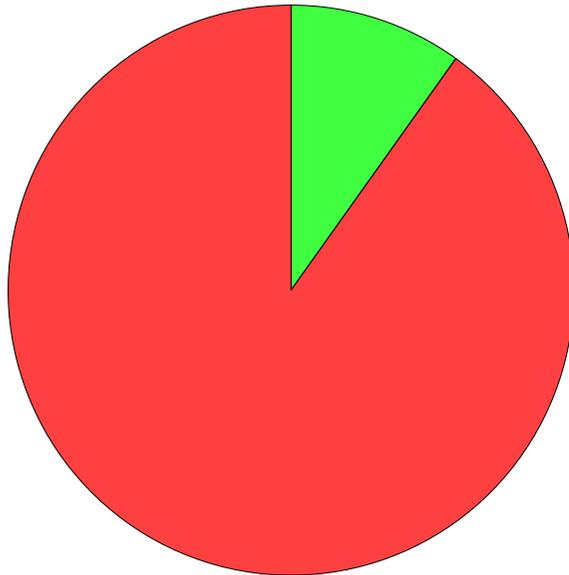
Your Opinion

Question responses: 313 (100.00%)

Question 32

Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?

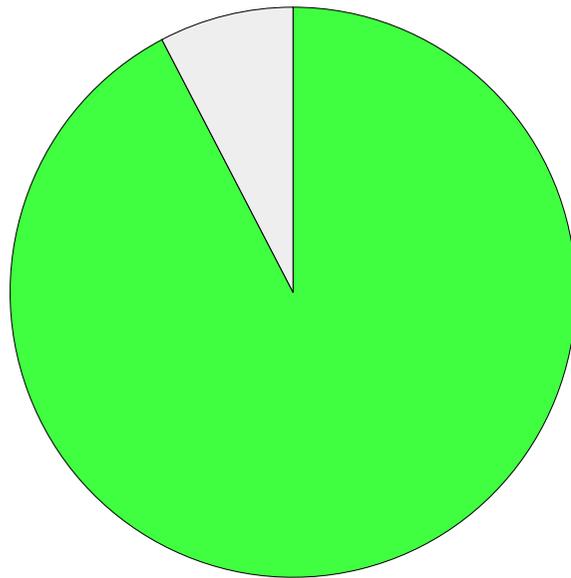
Yes / No



	% Total	% Answer	Count
Yes	9.90%	9.90%	31
No	90.10%	90.10%	282
Total	100.00%	100.00%	313

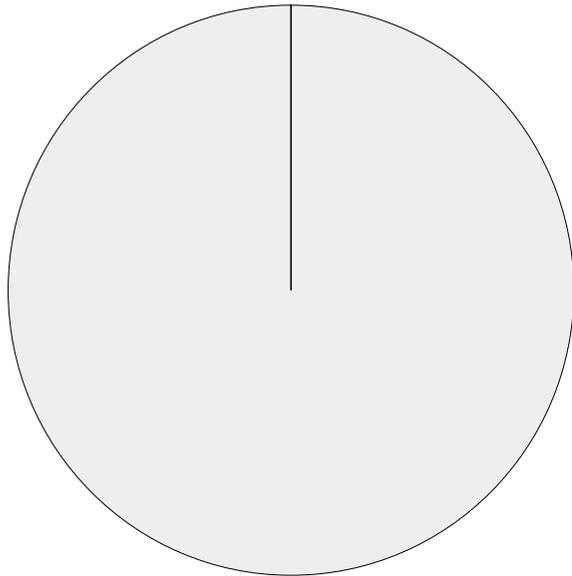
Responses

Question responses: **289 (92.33%)**



	% Total	% Answer	Count
■ Responses	92.33%	100.00%	289
■ No Response	7.67%	--	24
Total	100.00%	100.00%	313

Supporting evidence

Question responses: **0 (0.00%)**

	% Total	% Answer	Count
<input type="checkbox"/> Responses with File(s) Uploaded	0.00%	0%	0
<input type="checkbox"/> Responses with No Uploads	100.00%	--	313
Total	100.00%	0%	313

Issues and Options All Responses to Question 32

Number	Question 32
ID	LPIO21
Full Name	Mrs Jennifer Ponsford
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 think the need for large businesses to contribute to leisure and transport facilities has been overlooked. Areas offering good quality of life attract businesses, as this is a key mechanism used to attract highly skilled staff. Town center BID's have worked well in providing funds to upgrade town centers, this money is provided by private sector business. Why can't the same be done for leisure facilities and transport etc.?</p> <p>I also think the cost of maintaining all infrastructure in the above list. It is all very well providing these facilities but if the local authority or NHS have no money to run them then they are either not occupied or go into disrepair. The same goes for green infrastructure, developers should be required to place money in trust as a maintenance fund.</p>
Include files	
Number	Question 32
ID	LPIO100
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 32
ID	LPIO298
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	Yes, you can get developers to pay for school etc but what will they do to improve the lives of the people who have to spend an extra half an hour plus a day sitting in a traffic jam causing more air pollution or those who have to pay to get a taxi to the station as there is no parking? How can they improve parking when there is no space? They will be happy to pay the levy but this is not a viable solution in the long term.
Include files	
Number	Question 32
ID	LPIO353
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 32
ID	LPIO467
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	Re Bovingdon The problem lies with these proposals for multiple small sites on greenbelt land, none of which alone would warrant major improvements in infrastructure provision, but would impact greatly on Bovingdon's already strained services and congested High Street. None of these proposed developments can be allowed unless, and until improvements are made to infrastructure.
Include files	
Number	Question 32
ID	LPIO500
Full Name	Mrs Lynne Head
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The developers will be the only winners here, making huge profits on the back of our green belt. There is not sufficient public money (government funding) to provide our schools and hospitals with the funding they need. We will need new secondary schools, more nursery and primary schools, more qualified teachers, more GP surgeries, more qualified doctors, a new hospital in a more sensible location, more qualified medical staff. In addition, we will require new roads, better parking facilities at train stations, more trains, better local transport who is going to fund all this? The developers should be made to contribute substantially to these essential services; simply offering to build a primary school is a little bit like offering to put out a house fire with a thimble-full of water.
Include files	
Number	Question 32
ID	LPIO513
Full Name	Mr John Saunders
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 has already failed to provide adequate infrastructure improvements even though they have been needed for many years - in particular water/sewage, traffic, transport (rail and busses) and school places.
Include files	
Number	Question 32
ID	LPIO517
Full Name	Debbi James-Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Our current Infrastructure is already failing, so why would I believe that a new and improved infrastructure will be delivered to cope with more residents.
Include files	

Number	Question 32
ID	LPIO551
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 32
ID	LPIO643
Full Name	Mrs Carole Stokes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Current infrastructure already cannot cope
Include files	
Number	Question 32
ID	LPIO684
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>No</p> <p>Any level of significant housing development will require significant infrastructure investment for which the funds need to be provided by the developers and any original land owners.</p> <p>I fully recognise that it will be significantly easier to get CILs from large development opportunities, however this does not mean it needs to be a single large development site. I suggest it might be possible to partner with a small number of major developers across the whole of Dacorum, so CIL monies can be allocated in a controlled fashion allowing smaller parcels of land to be utilised in an efficient manner.</p>

	<p>I also now understand certain insurance companies are looking for investment opportunities for pension monies and alike. These insurance companies are looking to provide upfront infrastructure investment monies for development opportunities whilst recovering their investments from smaller developers (say 20-50 house parcels) who cannot support the significant SIL costs.</p> <p>All these options need to be considered and quantified. There needs to be clear understanding of the infrastructure burden for each development opportunity and monies that need to be recouped to support infrastructure upgrade.</p> <p>The current plan does not demonstrate this level of detail and therefore there can currently be no confidence that if significant development is to go ahead supporting infrastructure will be put in place in a timely manner.</p>
Include files	
Number	Question 32
ID	LPIO737
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	Not only are we supposed to welcome this proposed development but we are also going to be asked to contribute to the costs of the additional infrastructure required. There must be no increase in Community Charges to augment the costs of additional infrastructure, the costs must be born by all the other means proposed.
Include files	
Number	Question 32
ID	LPIO844
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	
Include files	
Number	Question 32
ID	LPIO939

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	Why would we contribute to a development that we don't welcome and don't want. The people who will profit will be landlords and developers. Villagers will be poorer, as they are paying for this plus increased travel due to increased petrol etc and be poorer socially as their village character will cease to exist. This is not something I wish to pay anything towards.
Include files	
Number	Question 32
ID	LPIO987
Full Name	Mrs Saunders
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 developers will be the only winners here, making huge profits on the back of our green belt. There is not sufficient public money (government funding) to provide our schools and hospitals with the funding they need. We will need new secondary schools, more nursery and primary schools, more qualified teachers, more GP surgeries, more qualified doctors, a new hospital in a more sensible location, more qualified medical staff. In addition, we will require new roads, better parking facilities at train stations, more trains, better local transport who is going to fund all this? All developers should be made to contribute substantially to these essential services.</p> <p>I now realise why you are more interested in approving large scale developments, rather than many smaller sites - because it's easier for you to request the developers pay for the new infrastructure on larger sites. You need to review your charging structure, so that even a development of 4 houses has to pay a contribution. Furthermore, larger sites should be charged a penalty, to encourage smaller developments which will have less environmental impact.</p>
Include files	
Number	Question 32
ID	LPIO1226
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	The problems in Bovingdon lie with these proposals for multiple small sites on greenbelt land, none of which alone would warrant major improvements in infrastructure provision, but would impact greatly on Bovingdon's already strained services and congested High Street. None of these proposed developments can be allowed unless, and until improvements are made to infrastructure.
Include files	
Number	Question 32
ID	LPIO1280
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	The Council is unable to deliver a sustainable infrastructure today. How it expects the infrastructure to cope in the future if developments are allowed as proposed is unclear.
Include files	
Number	Question 32
ID	LPIO1408
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	And by building in areas like Kings Langley and Berkhamsted you will not only be setting the CIL but receiving it too. Why not build in the areas that have capacity and brownfield sites?
Include files	

Number	Question 32
ID	LPIO1409
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	And by building in areas like Kings Langley and Berkhamsted you will not only be setting the CIL but receiving it too. Why not build in the areas that have capacity and brownfield sites?
Include files	
Number	Question 32
ID	LPIO1508
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	Our council taxes would contribute to housing that both Bovingdon and Kings Langley do not want.
Include files	
Number	Question 32
ID	LPIO1549
Full Name	MR PETER SUMMERFIELD
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, however, delivering improved infrastructure should not be achieved by increasing council tax.</p> <p>Developers must pay for upgrading or providing the extra infrastructure needed in the area. Developments affect the whole area by increasing the number of cars on the roads and the increase in the population.</p> <p>Cars are here to stay and it is extremely naive to assume that by adding walk and cycling routes into developments this will mean the end of the car being used! Obviously walking and cycling are extremely beneficial to one's</p>

	<p>health but the reality is that councils should actually be thinking of how they can improve the car situation, rather than trying to stamp it out. There are no new employment initiatives in Bovingdon so drivers have to use their cars to get to their places of work outside of the village.</p> <p>More car parks are needed at the stations and in the towns/villages, public transport has to be improved and developers have to allocate 2-3 parking spaces per house, not the 1.4 required at present. The present requirement of only 1 parking space per house/flat means that drivers are leaving cars on the surrounding streets and the problems begin. If the Council continue with this anti-car policy (ie limiting car parking wherever possible) then we are all in for a far bigger problem than it is at present.</p>
Include files	
Number	Question 32
ID	LPIO1567
Full Name	MR PETER SUMMERFIELD
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Developers must be told they have to pay towards improving or upgrading the infrastructure of the whole area, not only the infrastructure of their site. The development will affect the whole village by vastly increasing the number of cars on the roads and the huge increase in the population.</p> <p>Infrastructure costs should not be paid for by increasing council tax.</p>
Include files	
Number	Question 32
ID	LPIO1631
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 32
ID	LPIO1632

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 32
ID	LPIO1711
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 32
ID	LPIO1712
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	It is clear that the developers will make a tidy profit and the residents will be left with a bill through the rates to pay for an inadequate physical and social infrastructure. It doesn't fill me with confidence that crowd funding is quoted as a serious method of raising funds for infrastructure improvements in the area.
Include files	
Number	Question 32
ID	LPIO1811
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	How on earth can the Council identify what the appropriate infrastructure would be needed until its too late.
Include files	
Number	Question 32
ID	LPIO1896
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"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO1897
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"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures

	<ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO1927
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	The developers and land owners make large profits, and these never seems to make its way back into local communities in the form of facilities and emenities. Foot paths, cycle ways and open spaces are needed to enable local communities to feel connected together
Include files	
Number	Question 32
ID	LPIO1946
Full Name	Miss teresa finnigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Need to deal with the current infrastructure, before any future developments are even considered, a long way of indeed from that prospect and as for HCC's vision for 2050 that is amusing in itself, we are all gong to walk, cycle and car share to work, as we are all going to live and work in HH!
Include files	
Number	Question 32
ID	LPIO1980
Full Name	Mrs Katie Garner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Tesco were obliged to contribute to the infrastructure of Bovingdon when they bought the petrol station site but they didn't do anything for years and the mini roundabout at the top of the high street was in a terrible state until it was fixed. I don't have much faith in the timeliness and quality of developer infrastructure. It is not their responsibility to fix problems which existed before their development. Parking and road safety in Bovingdon needs to be addressed by Dacorum.</p>
Include files	
Number	Question 32
ID	LPIO2038
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	<p>The education infrastructure should not be based on the size of the individual development but placed in context. For example, the 45 new dwellings under construction in Bourne End are assumed to have no impact on primary and secondary education. We get a tiny play area somewhere between 0.06 and 0.1 hectare but no school or doctor.</p> <p>Calculating the level of developers' contributions is fraught. If they are building low rent houses profits are small but demand for infrastructure is high. I am concerned that only expensive houses will be built on the grounds that developers are concerned to maximise profit.</p>
Include files	
Number	Question 32
ID	LPIO2052
Full Name	Mrs Jane Hennell
Company / Organisation	Canal & River Trust
Position	Area Planner
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Developments can place additional liabilities and burdens onto the waterway infrastructure. Works to towpaths may be necessary to address the extra traffic resulting from a near-by development, or safety upgrades may be needed to our reservoirs as a direct</p>

	<p>result of development in the inundation zone, such as at that proposed adjacent to Wilstone reservoir.</p> <p>If these opportunities are to be realised and the impacts mitigated planning policies and infrastructure delivery plans should address the funding of such works. Please contact the Trust as we are happy to discuss whether infrastructure works to our network would be most appropriately funded via s106 or Community Infrastructure Levy.</p>
Include files	
Number	Question 32
ID	LPIO2076
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 Community Infrastructure Levy will not deliver a sufficient contribution towards the infrastructure needs for the new developments. In addition developers have a proven track record of reducing this to ensure they make a profit. The council recognises that developers need to make a profit in the plan however it does not explain how the shortfall will be met.</p> <p>Why should existing residents and taxpayer subsidise infrastructure to support new housing development only so developers can make a profit. Development should only take place if it can be fully funded by the developers.</p>
Include files	
Number	Question 32
ID	LPIO2174
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>Emphatically no. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. The Herts strategic roads plan for Dacorum identifies the constraints and limited East-West connectivity. It fails to come up with any solutions, because the topography means that there are none. So all it can propose is a number of small palliative measures. I accept that is all that is possible; I assume Herts and Dacorum also accept their own plan, but that</p>

	<p>simply proves that anything more dramatic in Tring and Berkhamsted is simply not possible in our geography of a steep sided valley with natural bottlenecks, for which there are no practical solutions. That must drive the conclusion that Tring and Berkhamsted are already at physical capacity. Hence the conclusion must be that growth on the scale suggested is impractical. This latest review does not acknowledge this inconvenient truth.</p>
Include files	
Number	Question 32
ID	LPIO2262
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	No, I do not have any confidence that the appropriate level of new infrastructure will be afforded by the Council or that the developers will be held to account enough to provide for it. Objectives of the current core strategy are not being met as it is.
Include files	
Number	Question 32
ID	LPIO2338
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	I recommend that local authorities, as part of the government's White Paper process, lobby for the reintroduction of development land tax. This last operated from 1976 to 1982 when the proceeds were collected by the Treasury. This time round, the proceeds should be kept by local authorities and used to fund all the infrastructure costs associated with new development.
Include files	
Number	Question 32
ID	LPIO2495
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	They are clear but not enforceable, developers are going to minimize their cost to maximize profitability that is a business fact they will not support infrastructure development on the scale that is needed and the council will have no means by which to ensure these are carried out to the standards necessary. There must be a clearly defined plan and budget that is in the public domain otherwise this will not happen
Include files	
Number	Question 32
ID	LPIO2668
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	The increase in GP provision is woefully inadequate. As someone who has lived in three areas of Hemel Hempstead in the last 30 years I have seen a significant increase in the time it takes to see a GP. The siting of new developments need to include a discussion with the nearest GP practice as I doubt very much that an increase of 500 dwellings (minimum 1000 extra people) would require 0.5 of a GP. This figure would also need to ensure that the demographic make up of the people living in the developments is taken into account - not clear from the statements here whether that has even been thought of.
Include files	
Number	Question 32
ID	LPIO2679
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	Council cannot support infrastructure now. How is it going to cope with further housing and people.

Include files	
Number	Question 32
ID	LPIO2709
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	The land owners of any approved sites will be the winners. Local Government or National Government will not have the funds or capacity to deliver what is currently needed never mind the increased needs.
Include files	
Number	Question 32
ID	LPIO2840
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	Currently the plans to improve infrastructure and services are vague and aspirational. There is already a deficit and it is hard to see how the different partners will cooperate to achieve the developments necessary. Past experience shows that this doesn't happen. Developers seem to evade responsibility and Local Authorities simply do not have the funding.
Include files	
Number	Question 32
ID	LPIO2886
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"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.

	<ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO3186
Full Name	Mr John Walker
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 32
ID	LPIO3445
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>The sites on Kings Langleys green belt would take the village off the scale on the table above and even more land would be lost.</p> <p>The village is already short of amenity land and to loose our green belt would make the situation worse.</p>
Include files	
Number	Question 32
ID	LPIO3504
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	Suggesting that crowd funding can be used to fund local infrastructure projects, or that woodland can be managed by local residents is laughable
Include files	
Number	Question 32
ID	LPIO3592
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 seem to hope that you will attract funding for new infrastructure, but the reality is that Dacorum Borough and Herts County Councils are already struggling for funding these aspects that enhance residents' lives and future funding will be difficult to attract effectively.</p> <p>The new school planned for the Croxley Green area has taken years and is still not being built yet, despite being overseen by St Clement Danes headship. New primary and secondary schools will take years more to come to fruition, meaning that existing residents will already struggle to get their children into a good local school, and this will be exacerbated for years to come.</p> <p>Existing GP provision in some parts of Hemel is stretched to capacity, so how you will get additional capacity remains to be seen. Your wording above and table is just rhetoric.</p>
Include files	
Number	Question 32
ID	LPIO3728
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	There is too much anecdotal evidence to suggest that private funding initiatives within housing developments is rarely fulfilled. This needs to be driven as services/infrastructure first before permission to build is granted.
Include files	
Number	Question 32

ID	LPIO3837
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	Silent on the level of funds available from the borough, Need clear expectations of contributes from developers with commitments held by bank guarantee to avoid developers failing to meet there commitments. Disappointing that the local authority hasn't indicated whether it will be the developer/ customer for social housing.
Include files	
Number	Question 32
ID	LPIO3976
Full Name	Mr Tim Varley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Surely an opportunity exists for consideration of a "windfall tax" on the increased value of land in the event a change of the status of land from Green Belt to Residential. This tax should be applied to the benefit of the local community whether it be infrastructure, funding to maintain the environment in the remaining Greenbelt or general improvements supporting the existing community.
Include files	
Number	Question 32
ID	LPIO4155
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	CIL good but to be effective needs to be imposed on all housing developments down to single new builds. The

	funds need to be ring fenced to support local infrastructure.
Include files	
Number	Question 32
ID	LPIO4249
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	This question states there are a number of mechanisms DBC use to secure these contributions, including planning conditions, legal obligations and a Community Infrastructure Levy (CIL) charge, but these mechanisms do not appear to have been fully explored, including the Duty to Cooperate with neighbouring Councils, i.e. Three Rivers, requires continual and effective dialogue throughout plan preparation over cross boundary matters. Only Gorhambury gets a mention, which affects east Hemel. The recent Autumn Statement also stated there are proposed changes to implement a CIL more quickly, to set rates which better reflect the uplift in land values between a proposed and existing use, and to introduce different rates for different changes in land use. Given the tenor of the Autumn Statement was to encourage "high quality, high density" house building in town and city centres and around transport hubs, 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, such speeding up is likely to be for these types of development. DBC should be looking to these type of developments rather than those proposed for Kings Langley, including Shendish..
Include files	
Number	Question 32
ID	LPIO4251
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	It's all about profit, not about using brown sites that are available and respecting the Green belt
Include files	

Number	Question 32
ID	LPIO4364
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	Crowdfunding, you're having laugh. Don't taxes cover it?
Include files	
Number	Question 32
ID	LPIO4415
Full Name	Mr Adrian Bate
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 well known that developer contributions to infrastructure are inadequate
Include files	
Number	Question 32
ID	LPIO4481
Full Name	Mr Philip Homer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Again we are still waiting for infrastructure improvements following previous developments.</p> <p>When developers say that they will provide certain contributions to infrastructure in order to attain planning permission past experience shows that they will either deliver a substandard job at the cheapest price possible, take years to follow through and deliver anything, or more frequently simply not deliver anything at all.</p> <p>Sort the infrastructure out now for the development that has already happened and then make developers improve the infrastructure to suitable level of quality prior to signing off on any new development.</p>

Include files	
Number	Question 32
ID	LPIO4523
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	Relying on developers of large sites will not solve the problems that the proposed increase in housing will bring. They will only build a cheap new hall or junior school whilst all the other related needs are left to be paid for the by the taxes of the residents existing and new.
Include files	
Number	Question 32
ID	LPIO4574
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	There is nothing to support the need for improved transport infrastructure and public transport provision. There is nothing to support he need for improved health provision apart from GP services. The identification of possible funding sources for educational and health provision is to be applauded, but where are the actual plans these are going to fund?
Include files	
Number	Question 32
ID	LPIO4608
Full Name	Mrs Alexandra Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There has been no identification of providing more GP surgeries or schools. All schools are currently running

	<p>at capacity. One primary school has been talked about in the Shendish plans but what about when these children need to go to secondary school or college!</p> <p>Talking about increasing council tax to pay for extra infrastructure whilst the developers cash in and "crowd funding"!!!! Are you expecting charity for infrastructure that you should be providing!</p>
Include files	
Number	Question 32
ID	LPIO4719
Full Name	Mr Andrew Criddle
Company / Organisation	Tring Sports Forum
Position	Vice Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There may be specialist funding available for sporting facility development that local community clubs can access to support infrastructure development. In order to identify and tap such potential sources of funding it will be important that DBC planners liaise with community clubs and organisations such as TSF to maximize the potential for funding sporting infrastructure.
Include files	
Number	Question 32
ID	LPIO4721
Full Name	Mr Andrew Criddle
Company / Organisation	Tring Sports Forum
Position	Vice Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	There may be specialist funding available for sporting facility development that local community clubs can access to support infrastructure development. In order to identify and tap such potential sources of funding it will be important that DBC planners liaise with community clubs and organisations such as TSF to maximize the potential for funding sporting infrastructure.
Include files	
Number	Question 32
ID	LPIO4744
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	Berkhamsted infrastructure is not adequately covered in the proposals.
Include files	
Number	Question 32
ID	LPIO4785
Full Name	Mr Andrew Thomas
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 no direct evidence but would suggest the figures for additional school places and additional playing fields or open spaces are woefully underestimated
Include files	
Number	Question 32
ID	LPIO4901
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 CIL is likley to be totally inadequate to put in place the infrastructure needed to support any of the variants of the plan. Developers have a long history of minimising any CIL and often where it may be deemed adequate it puts the cost of house purchase beyond the pockets of many people. The plan does not provide for the cost of the infastructure necessary to support the developments proposed.
Include files	
Number	Question 32
ID	LPIO5016
Full Name	Mrs Nicola Botha
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Up to 100 houses can be built and only 6 school places added. I suggest knocking on tthe he doors of 100 village houses to establish how many have children of school age in them! And to state a further 100 households has no impact on go provision is ridiculous.
Include files	
Number	Question 32
ID	LPIO5019
Full Name	Mrs Nicola 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 32
ID	LPIO5053
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 9.4.4 (above) says "A site's ability to support new infrastructure will be an important consideration when deciding on the size and location of growth in the new Local Plan". Given that Berkhamsted has insufficient ability to cope with the levels of new housing already in the pipeline BEFORE this new plan is published, how can ANY further expansion of Berkhamsted be justified? It is no use postulating that large sums would be raised from the Community Infrastructure Levy (CIL) - presumably to add to the existing large sums of CIL that remain unspent - when there would be no space for improving or enlarging the existing infrastructure without completely destroying the character of a market town by placing any new facilities at the periphery.</p> <p>It is difficult to believe that Dacorum would seriously resort to 'crowd funding' as a means of improving infrastructure provision, when they have had over ten years already to try this method for the replacement of the Pavilion - and have singularly failed to do so!</p> <p>It is a matter for concern that throughout the document Hemel Hempstead seems to have priority when it comes</p>

	to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate!
Include files	
Number	Question 32
ID	LPIO5149
Full Name	Miss michelle hilditch
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 reference here for any traffic calming or alleviation? Surely this is also a huge problem just as important as all of those listed above?
Include files	
Number	Question 32
ID	LPIO5206
Full Name	Ms Anne-Laure Mersier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	This sounds good but what about public transports and road increased traffic?
Include files	
Number	Question 32
ID	LPIO5296
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	One would need to ensure that developers' contributions to new infrastructure are clearly thought out and established when they present their plans, and firmly set into the contracts.
Include files	
Number	Question 32

ID	LPIO5340
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	Why on earth would we want to contribute to a development that we don't want? The only people who will profit will be developers and buy to let investors who don't necessarily live in the area so don't care about the blight this would bring to existing residents. The village character will cease to exist. I would not wish to pay a single penny towards this.
Include files	
Number	Question 32
ID	LPIO5366
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	The ability to support infrastructure should be a top priority, not a 'consideration'. Frankly, if developers are unwilling to invest significant amounts in our area they should be refused - development around here is highly competitive and the Tories' much-loved 'market forces' should surely ensure that good levels of infrastructure commitments occur? Otherwise the council is playing into the hands of developers, who as evidenced in the past will reduce these as much as they can. Also, crowd-funding infrastructure?! What are our taxes for if not this sort of thing?! If developers want to build so much they should support our communities.
Include files	
Number	Question 32
ID	LPIO5417
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	<p>As a planning authority, you should be establishing the infrastructure plan in the first instance and you approach of reliance on everyone else, will continue to lead to failure to develop the Borough in a public acceptable manner.</p> <p>One mechanism missing is a set of regulations for partnership to deliver elements of what is required; Produced shortly, it will facilitate interest parties o engage and plan, and in doing so, assist you in achieving your objective.</p> <p>Another is simply funding, either raised locally through existing revenue measures, a DBC fund raising exercise or requesting central government funds. Again, you have to tackle this issue which will confirm or otherwise your commitment. You need to bridge your desire for sensible, public acceptable planning with options to achieve it residents of DBC. Otherwise, this will be a pro-longed exercise in futility for everyone.</p>
Include files	
Number	Question 32
ID	LPIO5466
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	<p>The consultation does not explain how new infrastructure can be provided which will:</p> <ul style="list-style-type: none"> a) avoid further congestion on already overcrowded roads b) ensure additional water supplies when local abstraction levels are already overstretched c) ensure adequate removal of sewage waste and rainwater runoff, in the face of climate change forecasts of higher and more intense rainfall d) ensure adequate supply of energy, using local renewable energy sources e) reduce dependence on food grown overseas by encouraging more locally-grown food
Include files	
Number	Question 32
ID	LPIO5502
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	but,,, CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in Berkhamsted. It is desirable that residents are provided with information on plans to address the accumulated deficit to date and the need arising from planned developments.
Include files	
Number	Question 32
ID	LPIO5603
Full Name	Mrs Christine Cosgrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	this area does not have the infrastructure either in place or available for expansion
Include files	
Number	Question 32
ID	LPIO5696
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 32
ID	LPIO5797
Full Name	Mr Colin Colin Little
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Based on the assumptions above and if 360 homes are going to be built in Bovington then Bovington Academy will need to provide places for up to 30 additional children. I don't believe that the school has any plans for this additional intake. How will we provide the educational needs for the proposed new residents in Bovington?
Include files	
Number	Question 32
ID	LPIO5844
Full Name	Mr Adrian Ward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Community Infrastructure Levy (CIL) charge Are you really that naive to think DBC residents would be willing to PAY for a govt initiative????
Include files	
Number	Question 32
ID	LPIO5896
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. The infrastructure levy is currently only £250 per new dwelling and we understand this covers barely one third of the cost of provision. This should be set much higher for developments in Berkhamsted on the ground that they can afford to pay (as noted in 9.4.3). As noted above, it is not clear that statutory providers of infrastructure are in a position to fund what would be required to sustain the target number of new dwellings. We agree with 9.4.4 that a site's ability to support new infrastructure must be a determining factor when deciding on the size and location of future growth.
Include files	
Number	Question 32
ID	LPIO5929
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	Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO5995
Full Name	Mr Paul Craig
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 32
ID	LPIO6055
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	I think that contributions from developers must be used in the area surrounding the development for which they are requesting planning permission. This should lead to a more integrated approach to infrastructure needs.
Include files	
Number	Question 32
ID	LPIO6360
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	
Include files	
Number	Question 32
ID	LPIO6361
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	
Include files	
Number	Question 32
ID	LPIO6400
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>None of the figures are supportable or sustainable It makes no sense to build housing in an area where none of the infrastructure, physical or social, is capable of supporting growth.</p> <p>Currently, Berkhamsted has highest rate of CIL and currently a higher build rate combined with sub-standard infrastructure.</p>
Include files	
Number	Question 32
ID	LPIO6402
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>None of the figures are supportable or sustainable. It makes no sense to build housing in an area where none of the infrastructure, physical or social, is capable of supporting growth.</p>

	Currently, Berkhamsted has highest rate of CIL and currently a higher build rate combined with sub-standard infrastructure.
Include files	
Number	Question 32
ID	LPIO6409
Full Name	Mr Peter Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	But where is the will to make it happen? Currently, Berkhamsted has highest rate of CIL and currently a higher build rate combined with sub-standard infrastructure.
Include files	
Number	Question 32
ID	LPIO6424
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	Existing infrastructure isa breaking point prior to any major development.
Include files	
Number	Question 32
ID	LPIO6511
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	Solve existing issues first! Do not link to further developments; but solve the existing lack of investment and repair so that current residents actually receive what they deserve in physical, social and medical infrastructure.

Include files	
Number	Question 32
ID	LPIO6737
Full Name	Miss Oonagh Gilfillan
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 Community Infrastructure Levy will not deliver a sufficient contribution towards the infrastructure needs for the new developments. In addition developers have a proven track record of reducing this to ensure they make a profit. The council recognises that developers need to make a profit in the plan however it does not explain how the shortfall will be met.</p> <p>Why should existing residents and taxpayer subsidise infrastructure to support new housing development only so developers can make a profit. Development should only take place if it can be fully funded by the developers.</p>
Include files	
Number	Question 32
ID	LPIO6769
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	<p>But we have a classic chicken and egg situation. Developers make profits from house sales that support the local infrastructure, consequently, no affordable homes are built. Take away developer's profits to provide affordable homes and there is no money to fund the required infrastructure.</p> <p>The answer maybe to maintain the status quo and permit no future development in Dacorum.</p>
Include files	
Number	Question 32
ID	LPIO6909
Full Name	Bradford Gunn
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The thresholds set for funding infrastructure improvement do not reflect the needs of smaller communities like Bovington. The village's lack of infrastructure to support existing residents let alone any new development has not been addressed. Medical, educational, community facilities are at capacity, the road are congested and there is a serious lack of parking. These problems have not been addressed in either the 2013 or the current local plan and the proposed 20%+ increase in homes, population and resident vehicles is not sustainable.
Include files	
Number	Question 32
ID	LPIO7031
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 32
ID	LPIO7122
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	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. BRAG RESPONSE TO Q32 (FULL DOC ATTACHED TO Q46) Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new</i>

	<p>infrastructure?</p> <p>No</p> <p><input type="checkbox"/></p> <p>Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.</p> <p><input type="checkbox"/></p> <p>Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <p><input type="checkbox"/></p> <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.</p>
Include files	
Number	Question 32
ID	LPIO7333
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 32 (please note full document is attached to Q46)</p> <p>Question 32</p> <p><i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.</p>

	<input type="checkbox"/> Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures <input type="checkbox"/> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO7919
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 32
ID	LPIO7958
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 Q32 Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland,

	<p>community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.</p>
Include files	
Number	Question 32
ID	LPIO8007
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	it is both inappropriate and tendentious to suggest "Crowd Funding" as a source of funding for infrastructure improvement, or to rely on residents and volunteers to manage local woodland, community facilities etc.
Include files	
Number	Question 32
ID	LPIO8457
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a

	<p>sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO8553
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO8581
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LP108629
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO8675
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- Not aware of what mechanisms are available, but if crowd funding is being considered, it is glaringly obvious that the Council does not have funds for significant new infrastructure. Therefore this suggests that the proposed levels of development are completely unrealistic, and only developments requiring minor infrastructure improvements/additions should be considered, unless the developer can fund the infrastructure and facilities required – transport, doctors, schools, shops, etc.</p> <p>2- Developers of smaller sites should contribute towards a fund for infrastructure.</p> <p>3- Increasing council taxes for developments to which people are opposed would not be a vote-winner.</p>
Include files	
Number	Question 32
ID	LPIO8710
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	Berkhamsted is apparently ahead of its housing targets and is suffering from inadequate infrastructure. However, Hemel Hempstead seems to have been prioritised for infrastructure improvements.
Include files	
Number	Question 32
ID	LPIO8743
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build
Include files	
Number	Question 32
ID	LPIO8845
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO9029
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 32
ID	LPIO9039
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 32
ID	LP109501
Full Name	Duncan Eggar
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 COUNCIL and COUNTY COUNCIL RESPONSIBILITIES. Regardless of personal preferences I find it very difficult to make meaningful comment without an better appreciation of the proposed infrastructure provision for the various options proposed. I understand the difficulty of development responsibility lying at BC level and much of the infrastructure at CC level, but without the one the other is somewhat meaningless. Please will you demonstrate a closer working relationship between the various levels of government.</p>
Include files	
Number	Question 32
ID	LP109777
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage

	<p>local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO9825
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10000
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10048
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>...</p>

	<p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build
Include files	
Number	Question 32
ID	LPIO10117
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures

	<ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10165
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10222
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>.....</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10269
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>.....</p>

	<p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10319
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that

	Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10367
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure</p> <ul style="list-style-type: none"> • provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO10433
Full Name	Mr Daniel Parry
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. 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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
<p>Include files</p>	
<p>Number</p>	<p>Question 32</p>
<p>ID</p>	<p>LPIO10482</p>
<p>Full Name</p>	<p>David Burbidge</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>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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10532
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10580
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO10627
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10677
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10725
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10781
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	
Include files	
Number	Question 32
ID	LPIO10818
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10871
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</p>

	<p>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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO10919
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	
Include files	
Number	Question 32
ID	LPIO10968
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	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>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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11019
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p><i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a

	<p>sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO11066
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	
Include files	
Number	Question 32
ID	LPIO11146
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"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11193
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	No this is not a question to answer without research
Include files	
Number	Question 32
ID	LPIO11240
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11290
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11378
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11427
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>....</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p><i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures

	Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11492
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	Berkhamsted is apparently ahead of its housing targets and is suffering from inadequate infrastructure. However, Hemel Hempstead seems to have been prioritised for infrastructure improvements.
Include files	
Number	Question 32
ID	LPIO11616
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.

	<ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO11771
Full Name	Edmund Hoblely
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>...</p> <p>Brag Response to question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO11921

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>CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in Berkhamsted. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficits to date and the need arising from the development options.</p> <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate against target.</p> <p>Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures.</p>
Include files	
Number	Question 32
ID	LPIO11967
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><i>Identification does not bring solution. The Parish Council has already made the point that there is not enough drinking water available and that Government action is needed. Is all the building of places for employment and housing for the employees being directed in the wrong area – the South East is not the place, perhaps.</i></p>
Include files	
Number	Question 32
ID	LPIO12069
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>Standard BRAG response to Question 32. Please note full document is attached to Question 46</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12162
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>Standard BRAG response to Question 32. Please note full document is attached to Q46.</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12224
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12303

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>Standard BRAG response to Question 32. Please note full document is attached to Question 46.</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12369
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
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>If it is not already the case, we would recommend that developer contributions towards infrastructure are (first choice) ring fenced for infrastructure on the site for which the contribution is made, or (second choice) ring fenced</p>

	for infrastructure in the town/village where the development takes place.
Include files	
Number	Question 32
ID	LPIO12391
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	Crowdfunding, you're having laugh. Don't taxes cover it?
Include files	
Number	Question 32
ID	LPIO12447
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>Standard BRAG response to Question 32. Please note full document is attached to Question 46.</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that

	Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12495
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12542
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>Standard BRAG response for Question 32. Please note full document is attached to Question 46.</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12592
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12641
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	

Number	Question 32
ID	LPIO12690
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12738
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12787
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that

	Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12834
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO12882
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LP1012936
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage

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Include files	
Number	Question 32
ID	LPIO12985
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13034
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>...</p> <p>BRAG response to question 32 below (full BRAG response see question 46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO13087
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13135
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32

ID	LPIO13193
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	The CIL will not be enough and it will be left to Kings Langley residents to fund much of the infrastructure through out council tax.
Include files	
Number	Question 32
ID	LPIO13410
Full Name	Mr Alan Mitchell
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 the need for large businesses to contribute to leisure and transport has been overlooked.
Include files	
Number	Question 32
ID	LPIO13411
Full Name	Mrs Christine Mitchell
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 the need for large businesses to contribute to leisure and transport has been overlooked.
Include files	
Number	Question 32
ID	LPIO13469
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>Right now this says we don't know what infrastructure will be required, we don't know how much it will cost, and we really don't know how it can be funded..... Crowd funding seems a bit desperate and an inappropriate way to fund new infrastructure.</p> <p>Asking for contributions from developers should not allow them to change the form (mix of housing, quality etc) of their development project.</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13517
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</p>

	<p>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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13572
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage

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Include files	
Number	Question 32
ID	LPIO13625
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13653
Full Name	Moira and David Lea
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Who is to fund all the infrastructure needed for the proposed new homes?
Include files	
Number	Question 32
ID	LPIO13687
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13711
Full Name	Charlotte Wadsworth
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"> • The proposals would represent a 25% expansion of the village which in itself is likely to cause a significant and unreasonable impact on the quality of life on the existing community made worse by the no plans to improve the existing inadequate infrastructure. • No plans to ensure that the significant revenues generated by the development of these sites returns taxed income to the community to improve the infrastructure. It is already apparent that the land owners are developing these sites through self-owned corporations to minimise 'costs'.
Include files	
Number	Question 32
ID	LPIO13717
Full Name	Grace Wadsworth
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"> • The proposals would represent a 25% expansion of the village which in itself is likely to cause a significant and unreasonable impact on the quality of life on the existing community made worse by the no plans to improve the existing inadequate infrastructure. • No plans to ensure that the significant revenues generated by the development of these sites returns taxed income to the community to improve the infrastructure. It is already apparent that the land owners are developing these sites through self-owned corporations to minimise 'costs'.
Include files	
Number	Question 32
ID	LPIO13752
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13802
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO13858
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	

Number	Question 32
ID	LPIO14027
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build
Include files	
Number	Question 32
ID	LPIO14076
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</p>

	<p>would, in addition, like to add the following points concerning Question 33 of the above document.</p> <p>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14124
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>..</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage

	<p>local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14175
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO14318
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14404
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14453
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14502

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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14779
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14851
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO14897
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	
Include files	
Number	Question 32
ID	LPIO14953
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15004
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	

Number	Question 32
ID	LPIO15052
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15153
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 24 - How will Infrastructure be funded ?</p> <p>p.84 – The list of studies seems quite old, some of them are 10 years old. Are they not in need to updating to be</p>

	accurate and be in line with viability, market capacity and delivery assumptions?
Include files	
Number	Question 32
ID	LPIO15280
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 32 (please note full document is attached to Q46)</p> <p>Question 32: <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15331

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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate
Include files	
Number	Question 32
ID	LPIO15380
Full Name	Sue Wolstenholme
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 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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15442
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	

Number	Question 32
ID	LPIO15490
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> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15546
Full Name	Miss Tanya Assarat
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. 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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
<p>Include files</p>	
<p>Number</p>	<p>Question 32</p>
<p>ID</p>	<p>LPIO15595</p>
<p>Full Name</p>	<p>Melanie Llewellyn</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>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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a

	<p>sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15662
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO15685
Full Name	Mr Patrick Barr
Company / Organisation	Tring Hockey Club
Position	Chairman
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	
Include files	
Number	Question 32
ID	LPIO15721
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO15769
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</p>

	<p>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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO15816
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.

Include files	
Number	Question 32
ID	LPIO15874
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 recognise the need for new infrastructure, relevant to new development proposals to be funded in accordance with the guidance in paragraph 204 of the Framework and the CIL regulations. It is concerned that other sources of funding (e.g. crowd funding) are not appropriate to the planning process and not pass the relevant tests and finally, open to abuse.
Include files	
Number	Question 32
ID	LPIO16074
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO16128

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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO16187
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance</p>

	between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.
Include files	
Number	Question 32
ID	LPIO16244
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO16305
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO16367
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO16414
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO16480
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are</p>

	considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.
Include files	
Number	Question 32
ID	LPIO16556
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 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> . Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. . Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures . Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO16577
Full Name	mr Ian Passey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Finally where is the money coming from for the infrastructure in the plan?
Include files	
Number	Question 32
ID	LPIO16723
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	Issues 22 to 24 – it is considered essential that all growth delivered through the local plan is accompanied by an appropriate level of infrastructure, be it education, healthcare provision or new roads. It is also essential that growth delivered within Dacorum does not detrimentally impact upon Central Bedfordshire or its residents. CBC looks forward to continued engagement with the Borough Council in relation to the identification of any cross boundary infrastructure provision.
Include files	
Number	Question 32
ID	LPIO16839
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	As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions. GFRA Response to Question 32, full document attached to question 46 The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.

Include files	
Number	Question 32
ID	LPIO16907
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO16995
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment</p>

	in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.
Include files	
Number	Question 32
ID	LPIO17052
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17109
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured</p>

	<p>predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17146
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32

ID	LPIO17207
Full Name	Watford Borough Council
Company / Organisation	
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Question 32.</p> <p>Issue 24 highlights the need to provide new infrastructure to support development. The emphasis is placed on this infrastructure being delivered in collaboration with key infrastructure providers and using funds generated by new development (e.g. Community Infrastructure Levy). It may be useful to clarify that some infrastructure can be provided on site as part of a development (e.g. open space, recreation facilities) where a scheme is large enough to require this to meet a local need. In this context, it may be useful to highlight that new development can also provide opportunities to improve existing services and facilities where required.</p>
Include files	
Number	Question 32
ID	LPIO17243
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.

	<ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO17265
Full Name	AN 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>The infrastructural proposals are general and not integrated across service providers eg HCC Highways for roads, Thames Water for sewage, Affinity Water for water supply, West Herts Healthcare for medical support, other utility providers etc,</p> <p>Sites should be considered for development when funded plans are in place for the necessary infrastructure improvements.</p>
Include files	
Number	Question 32
ID	LPIO17300
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p>

	<ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO17356
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17408
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 32 below (copy of full response attached to question 46)</p> <p><i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate
Include files	
Number	Question 32
ID	LPIO17463
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17522
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17570
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 32 below (copy of full response attached to question 46)</p> <p>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</p> <p>Yes but</p> <ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate
Include files	
Number	Question 32
ID	LPIO17629
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 32, full document attached to question 46</p>

	The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.
Include files	
Number	Question 32
ID	LPIO17703
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17752
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 32 below - full document attached to Question 46</p> <p><i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate.
Include files	
Number	Question 32
ID	LPIO17808
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured</p>

	<p>predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17866
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17924
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO17974
Full Name	Mr Michael 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>Central government is not mentioned as a source of funding. If this plan is being driven by the central government's desire to provide more housing then surely it should contribute the major share of the money needed to provide the infrastructure that it requires. Putting more costs on to the developer will increase the cost of the homes which contradicts the aim of the Plan to provide "affordable housing".</p>
Include files	
Number	Question 32
ID	LPIO18033
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</p>

	<p>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> <p>GFRA Response to Question 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO18104
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO18161
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO18218
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>

Include files	
Number	Question 32
ID	LPIO18271
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18331
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	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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO18464
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>The current S106/CIL monies provided by the current developer mechanism is completely inadequate to support current needs. The contribution from developers needs to be completely rethought in order to provide 100% of the predicted requirement as determined by the agreed housing allocation. If this isn't addressed what is indirectly suggested here is that the current Dacorum Council tax payer will be funding a good part of this infrastructure. Very often Developers go back for increased development numbers but fail to deliver on their overall commitment.</p>
Include files	
Number	Question 32
ID	LPIO18499
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 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18546
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32

ID	LPIO18592
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18638
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 identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable.

	<p>It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism</p> <ul style="list-style-type: none"> • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate
Include files	
Number	Question 32
ID	LPIO18685
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that

	Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18731
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18777
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 identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate
Include files	
Number	Question 32
ID	LPIO18826
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p>

	<p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LP1018873
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>...</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to

	infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18919
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO18997
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</p>

	<p>and include the report findings in your final decision.</p> <p>GFRA Response to Question 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19060
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"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism. • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified

	<p>presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options.</p> <ul style="list-style-type: none"> We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate.
Include files	
Number	Question 32
ID	LPIO19117
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19175
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	I completely support the points discussed by the attached Report responding to the

	<p>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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LP1019233
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LP1019290

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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19344
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO19393
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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a

	<p>sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures</p> <ul style="list-style-type: none"> Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate. <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO19440
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 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local

	<p>authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism.</p> <ul style="list-style-type: none"> • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options. • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate.
Include files	
Number	Question 32
ID	LPIO19495
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19552
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19610
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>

Include files	
Number	Question 32
ID	LPIO19666
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19725
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19779
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 32</p> <p><i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism. • CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options. • We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact

	that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate.
Include files	
Number	Question 32
ID	LPIO19848
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO19932
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for</p>

	infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.
Include files	
Number	Question 32
ID	LPIO19989
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20046
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20103
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32

ID	LPIO20161
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20218
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20266
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.

Include files	
Number	Question 32
ID	LPIO20321
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20379
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20427
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that

	Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO20488
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20536
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	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.

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.

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.

BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46

BRAG response to Question 32 (please note full document is attached to Q46)

Question 32 *Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?*

No

- Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.
- Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures
- Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.

Berkhamsted Citizens response

Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?

Yes but

- Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism
- CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development

	<p>Plan), to cover accumulated deficit to date and the need arising from the development options</p> <ul style="list-style-type: none"> We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate
Include files	
Number	Question 32
ID	LPIO20583
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 identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Yes but</p> <ul style="list-style-type: none"> Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options We are concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a relatively higher build rate
Include files	
Number	Question 32
ID	LPIO20655
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO20711
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to</p>

	discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.
Include files	
Number	Question 32
ID	LPIO20759
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	As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council
Include files	
Number	Question 32
ID	LPIO20807
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 32
ID	LPIO20853
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	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>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO20929
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.

Include files	
Number	Question 32
ID	LPIO20984
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>Q32.BRAG. The Borough needs to be more robust in ensuring that infrastructure is provided. Withholding planning permission may be the only means given most providers do not fall under DBC's jurisdiction.</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate. <p>Berkhamsted Town Council response</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is</p>

	<p>already an infrastructure deficit in Berkhamsted. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficits to date and the need arising from the development options.</p> <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate against target.</p> <p>Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures.</p>
Include files	
Number	Question 32
ID	LPIO21069
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO21134
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO21210
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 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • We need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options • Suggesting Crowd Funding to fund infrastructure improvement, or relying on residents to manage local woodland, community facilities etc. is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate. • New infrastructure that is a fundamental requirement for a large site should be assessed in detail – it is easy to ‘throw in’ suggestions of a new road, shop, school, GP surgery, pub etc.

	without any regard to whether this is in any way viable or enhances the community. Not all infrastructure is good infrastructure – it has to enhance the whole area, not detract from it
Include files	
Number	Question 32
ID	LPIO21333
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO21379
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LP1021559
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 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p>

	<p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO21616
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 32, full document attached to question 46</p> <p>The use of Community Infrastructure Levy (CIL) and a calculable approach to developer contributions secured predominantly through Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development. Such infrastructure requirements have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough.</p>
Include files	
Number	Question 32
ID	LPIO21899

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"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO21935
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</p>

	<p>unique perceptive on what made the town attractive and what is now at risk.</p> <p>BRAG response to Question 32 (please note full document is attached to Q46)</p> <p>Question 32 <i>Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>No</p> <ul style="list-style-type: none"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO21968
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>CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in Berkhamsted. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficits to date and the need arising from the development options. Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate against target. Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures.</p>
Include files	

Number	Question 32
ID	LPIO22045
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 Issues and Options document briefly covers the most common mechanisms through which new infrastructure delivery is funded via the planning system, including Community Infrastructure Levy, planning conditions and legal obligations.</p> <p>It is welcomed that the document recognises the infrastructure-delivery advantages of the allocation of relatively large development sites and the need to ensure infrastructure contributions are not set at a level that threatens the delivery of development.</p> <p>The Council should explore, on an ongoing basis, options for seeking central Government support for the delivery of infrastructure, and development more generally. For example, the Government has committed in its Autumn Budget to commit a further £2.7 billion to its Housing Infrastructure Fund, which will issue capital grants on a competitive basis to local planning authorities in areas of high housing demand</p>
Include files	
Number	Question 32
ID	LPIO22146
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 32
ID	LPIO22189
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 32
ID	LPIO22234
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 32
ID	LPIO22513
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"> • Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options. • Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal – especially in a period of economic uncertainty and increasing inflationary pressures • Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.
Include files	
Number	Question 32
ID	LPIO22563
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>CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in Berkhamsted. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficits to date and the need arising from the development options.</p> <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate against target.</p> <p>Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures.</p>
Include files	
Number	Question 32
ID	LPIO22633
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>CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in Berkhamsted. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficits to date and the need arising from the development options.</p> <p>Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate against target.</p> <p>Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures.</p>
Include files	
Number	Question 32
ID	LPIO22710
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 32 – Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?</i></p> <p>Paragraph 9.4.3 includes reference to innovative methods of securing funding and potential working with HCC and others to improve the chances of securing external funding. The A414 Strategy will assist this process.</p> <p>The document states in paragraph 9.4.4 that the site’s ability to support new infrastructure will be an important consideration when deciding on size and location of growth, recognising that it can be easier to secure new infrastructure for limited number of large sites. We welcome this approach and agree with the point.</p> <p>Dacorum identifies the need to work with HCC and other Boroughs / providers. This could be to develop bids for appropriate central government funding sources or planning for the impacts of change in the NHS which can have implications for travelling patterns. HCC agrees with need to take into account cumulative impact of smaller sites which together can lead to greater infrastructure need – this is important in order to reduce the need to travel.</p> <p>Green Infrastructure should be recognised as an Infrastructure need.</p>

Include files	
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Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	590
Filtered Respondents	446
Questions	<p>Question 33</p> <p>Do you agree that the three growth levels proposed are the most reasonable to consider?</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-33
Pivot	<i>(none)</i>
Document Name	Question 33 - Summary Report
Created on	2019-04-23 08:59:43
Created by	Strategic Planning Admin

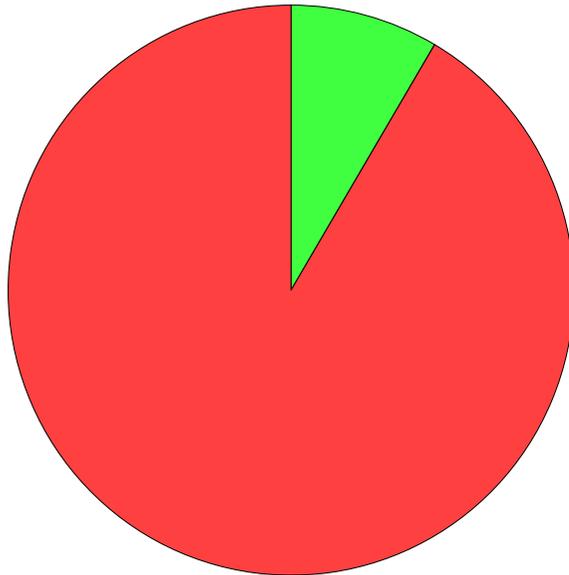
Your Opinion

Question responses: **590 (100.00%)**

Question 33

Do you agree that the three growth levels proposed are the most reasonable to consider?

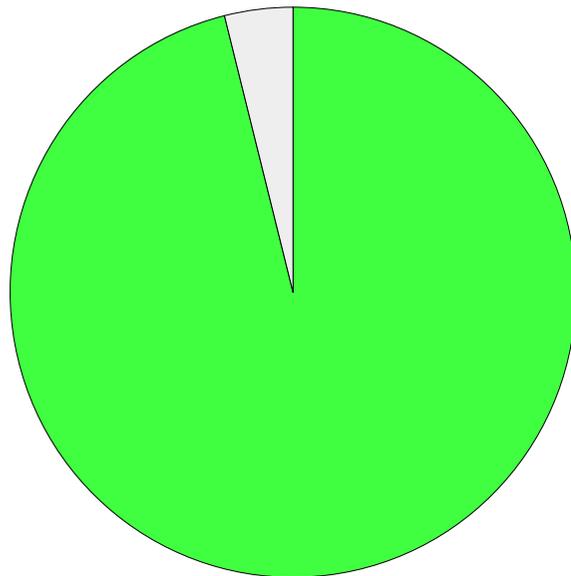
Yes / No



	% Total	% Answer	Count
■ Yes	8.47%	8.47%	50
■ No	91.53%	91.53%	540
Total	100.00%	100.00%	590

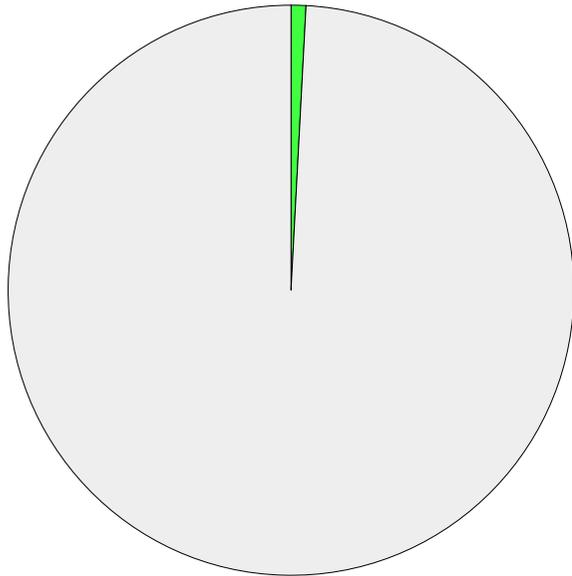
Responses

Question responses: **567 (96.10%)**



	% Total	% Answer	Count
Responses	96.10%	100.00%	567
No Response	3.90%	--	23
Total	100.00%	100.00%	590

Supporting evidence

Question responses: **5 (0.85%)**

	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.85%	100.00%	5
■ Responses with No Uploads	99.15%	--	585
Total	100.00%	100.00%	590

Issues and Options All Responses to Question 33

Number	Question 33
ID	LPIO22
Full Name	Mrs Jennifer Ponsford
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 the Governments upper figure is reasonable or accurate as they have not accounted for the potential impacts of Brexit, which will have the greatest impact on the south east of England. This figure would allow development of far too much greenfield land and would place enormous pressure on already very limited infrastructure. I do not see central government suddenly giving the NHS loads of money to fund the increased need as a result of so much housing, or handing out cash to local authorities to meet the increased need for social and transport infrastructure. The SMHA has the greatest level of calculation and is possibly the most accurate at this period as it is more localized.
Include files	
Number	Question 33
ID	LPIO40
Full Name	Mr David Munnery
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The government upper figure is unsustainable and unjustified. 25000 new homes potentially adds 50-60,000 population growth to the Borough which is disproportionate development for the current size of the Borough which risks changing the character of the local areas, and without significant infrastructure investment risks major road congestion including increased commuter traffic.
Include files	
Number	Question 33
ID	LPIO101
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	I'd go for the Draft Governmet figure. They can't force you to take more than that.
Include files	
Number	Question 33
ID	LPIO178
Full Name	Ms Rebecca MacRae
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 is best.
Include files	
Number	Question 33
ID	LPIO179
Full Name	Ms Rebecca MacRae
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	1a is the best option for balancing the requirements for housing and environmental impact.
Include files	
Number	Question 33
ID	LPIO278
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The draft government figure is the only one you should be working towards. We are in the throws of Brexit, who

	knows what impact that will have but it will come with a more controlled immigration policy which suggests we should not be relying on inflated population growth figures, following the trend of recent years. Why build more than you have to - especially destroying green belt land in the process? Once you've taken our countryside away, you can't give it back.
Include files	
Number	Question 33
ID	LPIO299
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	I think you should continue with your current figure of <500 homes a year until we know whether the government are going to do a u-turn like they do on most decisions made on education etc. After Brexit the figures will so I think you should hold off. The current population growth forecast for the country is unsustainable by our health system and schools as well as transport. Instead of telling boroughs to simply build more houses, schools and roads you should respond to the government and ask what measures they are taking to reduce the rate of population growth?
Include files	
Number	Question 33
ID	LPIO352
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	It does seem reasonable to consider the three options ... however if effort is a criteria then the first two options are best to concentrate on
Include files	
Number	Question 33
ID	LPIO396
Full Name	Ms Penny Gore
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Only the draft Government figure - or even less - should be considered. A cautious approach should be taken. Why sign up immediately to wholesale destruction of Green Belt in the current climate of extreme uncertainty?
Include files	
Number	Question 33
ID	LPIO399
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	602 houses per year is a realistic figure prepared and agreed locally, and in the present volatile situation this should remain. Current Government targets are not realistic at the present time.
Include files	
Number	Question 33
ID	LPIO468
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	It is important that the three options are considered but the first option of Draft Government Figure should be followed
Include files	
Number	Question 33
ID	LPIO486
Full Name	Susan Justice
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Why plan for more than you are actually obliged to at this time? I fear any sites earmarked "just in case" will suffer blight and deteriorate so much that they are more likely to be built upon. Better to wait and see what Brexit does to the population, and keep to present plan for now. These are very uncertain times and the forecasts so widely different.
Include files	
Number	Question 33
ID	LPIO501
Full Name	Mrs Lynne Head
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Government targets are unrealistic and unachievable. Historic data on house building shows that house builders have been unable to reach government targets year on year. I do not see this year being any different.
Include files	
Number	Question 33
ID	LPIO502
Full Name	Mrs Lynne Head
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	602 homes is more realistic and more likely to be achieved than higher targets.
Include files	
Number	Question 33
ID	LPIO552
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 33
ID	LPIO573
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	Option 1 602 maximum - unlikely to be achieved anyway
Include files	
Number	Question 33
ID	LPIO644
Full Name	Mrs Carole Stokes
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	we need only build what we have to
Include files	
Number	Question 33
ID	LPIO685
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 I believe option 2 and 3 are clearly unsustainable (and probably unachievable) in terms of infrastructure capacity and environmental impact. Therefore only option 1 - 602 houses per year is a realistic figure and so should be the target plan. However I do believe we need to build high quality and well structured housing developments so some sensible building on green belt may be most appropriate.

Include files	
Number	Question 33
ID	LP10723
Full Name	Mr Miguel Patel
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 outlined below, with the exception of Option 1A, all options are inappropriate for the following reasons:</p> <p>A jump from the current yearly average of 404 to 602 homes a year is already a considerable increase.</p> <p>Exceeding this rate would surpass the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable. To note, experience has shown that even at the current rate of home building, infrastructure improvements have been virtually absent. If more schools, hospitals and roads are to be provided, the loss of green space, biodiversity and the coalescence of villages and towns would be unavoidable.</p> <p>One point of huge importance is that Dacorum falls within the London commuter belt, served by the west-coast mainline rail corridor, which is already at full capacity at the peak. This is forecasted to be alleviated somewhat by the construction of HS2. However, within the timeframe set out in the local plan, much of the proposed housing (most notably in options 2 and 3) would be in place prior to the completion of HS2. Increased freight movements during construction, which will reduce passenger train paths, will further deplete Euston station's capacity to receive commuters.</p> <p>Given that train services are already at capacity and the construction of HS2 will constrain Euston for at least another 9 years, it is difficult to envisage how housing growth in excess of 602 homes a year could be sustained. The ability of smaller stations such as Kings Langley to deal with a potential doubling of commuters is also highly questionable.</p> <p>With regard to road congestion, Kings Langley already suffers greatly from its proximity to the A41/M25 roundabout. Due consideration needs to be given to the pollution and health impacts any expansion of the village would have.</p>
Include files	
Number	Question 33
ID	LP10738
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>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 33
ID	LPIO823
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	Consider the proposal for 430, thought to be adequate until recently.
Include files	
Number	Question 33
ID	LPIO869
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	The proposal for 430 should be considered given this was thought to be adequate until very recently
Include files	
Number	Question 33

ID	LPIO888
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	The inadequate infrastructure currently in place means none are reasonable.
Include files	
Number	Question 33
ID	LPIO940
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	Apart from option 1a, all others are unsustainable.
Include files	
Number	Question 33
ID	LPIO989
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We only build what we have to, with an emphasis on small developments, and re-development of brownfield sites and not unnecessarily building on green belt.
Include files	
Number	Question 33
ID	LPIO1023
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	Only the draft Government figure - or even less - should be considered. A cautious approach should be taken, as the effect of Brexit on the Borough's housing needs cannot be predicted.
Include files	
Number	Question 33
ID	LPIO1047
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	See Q 16
Include files	
Number	Question 33
ID	LPIO1107
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	Only Option 1 should be considered
Include files	
Number	Question 33
ID	LPIO1151
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	Why propose and promote levels of need higher than the Government target? Why 756? Councillors (and Planners) defended the annual growth of 430 homes previously so what has happened that they are now promoting a 75% increase?

Include files	
Number	Question 33
ID	LPIO1208
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>As outlined below, with the exception of Option 1A, all options are inappropriate for the following reasons:</p> <p>A jump from the current yearly average of 404 to 602 homes a year is already a considerable increase.</p> <p>Exceeding this rate would surpass the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable. To note, experience has shown that even at the current rate of home building, infrastructure improvements have been virtually absent. If more schools, hospitals and roads are to be provided, the loss of green space, biodiversity and the coalescence of villages and towns would be unavoidable.</p> <p>One point of huge importance is that Dacorum falls within the London commuter belt, served by the west-coast mainline rail corridor, which is already at full capacity at the peak. This is forecasted to be alleviated somewhat by the construction of HS2. However, within the timeframe set out in the local plan, much of the proposed housing (most notably in options 2 and 3) would be in place prior to the completion of HS2. Increased freight movements during construction, which will reduce passenger train paths, will further deplete Euston station's capacity to receive commuters.</p> <p>Given that train services are already at capacity and the construction of HS2 will constrain Euston for at least another 16 years, it is difficult to envisage how housing growth in excess of 602 homes a year could be sustained.</p>
Include files	
Number	Question 33
ID	LPIO1281
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	The targets should be set much lower at a local level, determined by local people and the supply of suitable land (not Green Belt) for development.
Include files	
Number	Question 33
ID	LPIO1333
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>I believe that new homes should be build on a needs basis and not be based on "possible" numbers in the future. Building on precious greenbelt land in villages will ruin the look of the villages forever not to mention the wildlife.</p> <p>It has been reported that immigration in this country has gone down significantly with further numbers expected to fall as we leave the EU. It is fair to say that this could considerably impact the number of housing needed in the future.</p>
Include files	
Number	Question 33
ID	LPIO1410
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	If you have an unlimited supply of land yes. Build on areas with the sites, connect and build new infrastructure and ensure developments are sustainable. Green belt development is only ever acceptable as a last and final resort.
Include files	
Number	Question 33
ID	LPIO1458
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	The existing main transport infrastructure links (Trunk roads and main-line rail) are not sufficient to support these high numbers of new developments across Hertfordshire, and there are no government plans in place to improve the capacity of the existing infrastructure. Policy should be to limit the quantity of new builds until the proper facilities are in place .
Include files	
Number	Question 33
ID	LPIO1509
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	Building should be on a needs basis not a prediction. And in areas that have the infrastructure like existing larger towns.
Include files	
Number	Question 33
ID	LPIO1533
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	We have been experiencing very unusual conditions. The rate of population growth for western Europe is of the order of 0.5% net per annum, excluding external migration. Assuming a population of 150,000 for Dacorum, and a household size of 2.4, this gives a required annual growth in housing of only 312 units. We have experienced a period of totally uncontrolled immigration, the majority of which must have been into the south-east. Last year it was still running at a quarter of a million net.. Since Brexit has been decided on there has already been a substantial reduction. The figure will certainly normalise at a much lower figure once proper controls are established again. In addition we have been in an unprecedented period of quantitative easing when in effect the Government have been printing money. This has flooded the banking system with money

	<p>at the same time as interest rates have been artificially depressed to their lowest ever rates in over 300 years, stimulating demand for property & other assets. This has driven up demand for houses & their prices artificially (i.e. everyone wants to buy one in the best places).</p> <p>In the circumstances developers are only too keen to develop Green field sites. If Green Field status is removed value goes up from say £8,000 per acre to £20 million, and they are sitting on a huge gain for nothing. Development of farmland Green Field sites must be resisted at all costs. If we really are forced to build in the sort of huge numbers contemplated, all this development must take place on existing Brown Field sites & preferably in only the large towns (eg Hemel Hempstead), where by virtue of the concentration of population it is viable to provide the necessary large improvements in infrastructure that are required. To achieve this, densities will have to be increased along with considerable increase in heights. One can see from the pained comments from residents of the three smaller towns, that these have already suffered from a large increase in population & traffic, without corresponding increase in infrastructure, including schools & medical facilities. Both Bovingdon & Markyate badly need parking provision.</p> <p>In all the circumstances we should be cautious, and continue with the present rate of building of 430. If the government insists on higher rates the Council with the assistance of the County Council and other councils of a like mind should resist such policies with all powers at its disposal.</p>
Include files	
Number	Question 33
ID	LPIO1550
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	Primarily NO houses should be built on greenbelt/greenfield land in Bovingdon, or elsewhere.
Include files	
Number	Question 33
ID	LPIO1568
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	No development should take place on greenbelt or greenfield land.
Include files	
Number	Question 33
ID	LPIO1582
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	Even option 1 is too high given infrastructure pressures. Why can't we keep to our Plan of 430 houses, which was only agreed very recently? Or - even better - leave our Green belt alone, and build far fewer. See earlier answers re questioning the Govt's numbers and the types of housing being built.
Include files	
Number	Question 33
ID	LPIO1634
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	Only items 1 and 2 are 'reasonable', although lower levels should also be considered. Option 3 is disproportionate to the current housing stock size.
Include files	
Number	Question 33
ID	LPIO1661
Full Name	Mrs Melanie and Peter Domb
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option 1 is the only sustainable option and, even then, it is probably too much
Include files	
Number	Question 33
ID	LPIO1681
Full Name	Jenny Thorburn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option1 only
Include files	
Number	Question 33
ID	LPIO1695
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	Only option 1 is viable for our village of Kings Langley
Include files	
Number	Question 33
ID	LPIO1696
Full Name	MR JONATHAN HAIGH
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 1 is viable for our village of Kings Langley.
Include files	
Number	Question 33
ID	LPIO1713

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	No I don't agree. 602 homes being built PER YEAR is ridiculous. I will be writing to David Gauke about the unreasonable figures plucked out and the massive assumptions made. It's NOT sustainable.
Include files	
Number	Question 33
ID	LPIO1716
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	The increase in numbers on all three options would have detrimental effects on Kings Langley and turn it into another part of Hemel
Include files	
Number	Question 33
ID	LPIO1773
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	In Berkhamsted the current size of the town and infrastructure constraints have not been considered. Because of this the ability to deliver any of the three growth options is not possible by using Green Belt land. Currently 600 new home are under construction in Berkhamsted which fulfils the councils current objectives.
Include files	
Number	Question 33

ID	LPIO1812
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	Much lower targets.
Include files	
Number	Question 33
ID	LPIO1813
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 33
ID	LPIO1898
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"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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. • 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.”*

- 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 this should be factored in. 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 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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 even up to 2025, depending on when the new plan was adopted.

Include files	
Number	Question 33
ID	LPIO1928

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 of housing growth should be considered. It is already a densl populated part of the country. Local infrastructure is unable to support even current levels of population. Growth would only make this worse.
Include files	
Number	Question 33
ID	LPIO1947
Full Name	Miss teresa finnigan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No GB removal and targets should go on current local needs and demands not the needs of the London's over spill!
Include files	
Number	Question 33
ID	LPIO2040
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	I think existing calculations of housing need (national and local) need to be reviewed in light of Brexit changing population migration, not simply within the EU but more widely. The questions are will migrant workers go home; will London continue to attract workers seeking to commute in? There is a risk that hundreds of extra houses will be built and sold at high prices initially but lose their value as there will be too many houses of the wrong kind in the wrong place by 2036.
Include files	
Number	Question 33

ID	LPIO2175
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>Emphatically no. It is not reasonable to set a housing target above numbers achievable considering the unusual topographic and high proportion of Green Belt and AONB constraints of the area. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. As DCLG "Planning for the right homes in the right places: consultation proposals" 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>Option 3 should be a complete non starter. As the report states, this would require building on large areas of Green Belt and flood plain, That is utterly irresponsible, and proves that Option 3 is physically not practical. It should be rejected as such.</p>
Include files	
Number	Question 33
ID	LPIO2228
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 not think we should be randomly plucking figures out of the air and playing into the developers or central governments hands. I think we should carefully apply all future new build against the criteria set out in the objectives and vision of this Local Plan and against the core strategy and only create new build that complies with a high multiplier of these criteria. eg. If we need</p>

	<p>good quality, energy efficient, small affordable one and two bedroom sustainable dwellings then that is what we should build. We should ignore what the developers want to provide to us to maximise their profits and insist on building to local demand in places where the infrastructure can be developed to provide good access to effective transport facilities, where people can cycle or can walk easily to amenities (including food growing) and jobs in order to keep carbon emissions down. We should not rush into building more 'white elephants'. We have enough of those in the current housing stock which needs retrofitting as a matter of urgency.</p>
Include files	
Number	Question 33
ID	LPIO2339
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>Until more and better evidence is available, there seems to be no case for adopting any other figure than 602. I refer you also to my response to question 16.</p>
Include files	
Number	Question 33
ID	LPIO2410
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	<p>The existing main transport infrastructure links (Trunk roads and main-line rail) are not sufficient to support these high numbers of new developments across Hertfordshire, and there are no government plans in place to improve the capacity of the existing infrastructure. Policy should be to limit the quantity of new builds until the proper facilities are in place .</p>
Include files	
Number	Question 33
ID	LPIO2415
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	<p>With the exception of Option 1A, all options are inappropriate for the following reasons:</p> <p>A jump from the current yearly average of 404 to 602 homes a year would seem to be a considerable increase.</p> <p>Current infrastructure is already stretched due to over capacity. There is already grid lock on many of our roads and junctions at peak time (access point to M25). Air pollution is also approaching unacceptable levels.</p> <p>Exceeding this rate would surpass the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable.</p> <p>Observing the current rate of home building, infrastructure improvements have been virtually absent just loading pressure on existing services. If more schools, hospitals and roads are to be provided, the loss of green space, biodiversity and the coalescence of villages and towns would be unavoidable.</p>
Include files	
Number	Question 33
ID	LPIO2442
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>These figures are not sustainable and the infrastructure would need substantial redesign and development to support them in the Hemel Hempstead, Kings Langley and Apsley areas.</p> <p>The housing requirements should be based on the local need, not on modelled predictions based on economic growth. Not all want the local economy to grow at the expense of our quality of life, especially if the growth is encouraging migration of workers from outside the area driving the demand for housing up. Nor should we encourage commercial development that create a majority of jobs that will be filled by bringing in new workers to the area.</p> <p>Housing should be for local people working locally. It is not clear who all these houses are for and who will be buying them.</p>
Include files	

Number	Question 33
ID	LPIO2445
Full Name	Mrs Joanne Carrington
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 33
ID	LPIO2469
Full Name	Mrs Joanne Carrington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Anything over the government requirement is nonsensical
Include files	
Number	Question 33
ID	LPIO2498
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	needs to be assessed based on local conditions not as a generalisation
Include files	
Number	Question 33
ID	LPIO2541
Full Name	Mr Paul Crosland
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 housing 'need' - as distinguished from housing 'demand' does not appear to have been adequately defined. Arguably, if housing is 'needed' for commuters working in London, it could be satisfied by developing in the vicinity of any of the rail stations on the West Coast Main Line, and the numbers of houses planned for Berkhamsted, Tring etc. is then determined by 'demand', not by need.
Include files	
Number	Question 33
ID	LPIO2558
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	The number of houses per year appears to be a ridiculously high number and would seem to be unsustainable when taking into account the required growth in all types of services.
Include files	
Number	Question 33
ID	LPIO2628
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	Only the government assessed 602 should be contemplated as that is decided by a fair national formula. The 'locally assessed need' figure looks to be artificially constructed and would drive unacceptable sacrifice of green belt
Include files	
Number	Question 33
ID	LPIO2681
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 further building as infrastructure cannot cope
Include files	
Number	Question 33
ID	LPIO2712
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	Far too high a number of additional homes. The Green belt should be a constraint as it was meant to be. We must stop Kings Langley being subject to coalescence with the surrounding towns.
Include files	
Number	Question 33
ID	LPIO2740
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	It needs to be much LESS. It's RIDICULOUS. You are all lining your pockets
Include files	
Number	Question 33
ID	LPIO2824
Full Name	mrs Gillian Hooper
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 think option 3 is appropriate or necessary. Should be removed.
Include files	

Number	Question 33
ID	LPIO2887
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 is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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.
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO2909
Full Name	Mr Kenneth Watts
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 Option 1 statement speaks of 'some limited Green Belt land'. However, it then goes on to say 'The amount of Green Belt land needed in this option broadly equals the amount of land the Green Belt study identified as not fully meeting the Government's criteria for continued Green Belt designation'. This suggests something far greater than 'some limited' land. In the Stage 2 Green Belt Review and Landscape Appraisal (2016) land parcels across Dacorum have been given an overall 'purposes assessment' and ranked from 'Strong' to 'Weakest' (see my response to Q14 and Map 5, page 54 of that Appraisal). If 'not fully meeting' means everything not ranked 'Strong' in that report then virtually all the land within and peripheral to Kings Langley would not qualify and is potentially at risk. The only exceptions are the Wayside Farm land to the east of the A4251 and the slim finger of Rectory Farm land, including the football club and up to the railway. All other land is ranked 'Moderate' to 'Weakest'. There also seems to be gross inconsistency across Dacorum as a whole with very evident large areas of 'strong' purpose ranked land around and between all other towns and villages. This rather suggests there is a pre-determined bias toward development in Kings Langley.</p> <p>This begs the question as to what Dacorum defines as 'growth'. The documents I have studied suggest this would be jobs and housing concentrated within the borough. In Kings Langley this is already true of most of the existing smaller business enterprises (albeit almost exclusively located in Three Rivers), with the exception of Imagination, where it would appear that the majority of staff commute IN to Kings Langley. Substantial new housing development in Kings Langley will principally attract London commuters. Is Dacorum's economic model for growth based on rates and social spending resulting from people who work elsewhere whilst further burdening local services and transport systems? Commuter rail traffic into London is already saturated and local roads and motorways are fast approaching a similar state.</p> <p>The strategy overall is based on predictions of growth. Prediction is merely guesswork in fancy dress but is being relied on to decide the fate of local communities and the 'use it once only' Green Belt. Green Belt land should only ever be committed to development where growth can be truly internal, that is where both commercial and housing development are located in APPROPRIATE locations and within easy LOCAL commute from each other. More importantly, it should be on brownfield land as a priority with greenfield/Green Belt land being allocated as a VERY LAST RESORT and not before the need is firmly established. That does not mean speculative allocation in the hope developers will bite and build commercial premises that nobody wants and houses that only relatively affluent commuters can afford.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 33</p>
<p>ID</p>	<p>LP102979</p>

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 1 is the only option that will allow the right level of development to be combined with our environmental needs and infrastructure capacity.
Include files	
Number	Question 33
ID	LPIO2980
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 1 is the only option that will allow the right level of development to be combined with our environmental needs and infrastructure capacity.
Include files	
Number	Question 33
ID	LPIO3012
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	Developers are keen to use green field sites, as they are much more profitable. Agricultural land £10,000/acre, building land £1,000,000+.
Include files	
Number	Question 33
ID	LPIO3057
Full Name	Mrs Rosie Eisenstadt
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Don't build where there are no jobs. Brexit may change the requirements as will the birth rate dropping. Don't sacrifice Green Belt when we really have no idea how many homes we will need.
Include files	
Number	Question 33
ID	LPIO3102
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 stated previously the start point should be 430. The maximum that should be contemplated is 602 the draft Government figure. The interpretation of the Government consultation paper on assessing need is incorrectly described in option 3. I believe you have only adopted this interpretation in order to persuade residents that 756, the figure you are aiming at, should be accepted rather than risk an even higher figure. A share of St Albans housing on the Dacorum east boundary has to be included
Include files	
Number	Question 33
ID	LPIO3180
Full Name	Miss Herbert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The government have put no thought into finding alternative solutions rather than building on greenbelt It is within our gift to fight and maintain village status for Kings Langley Maintaining attractions like Wayside Farm is imperative to us maintaining our village status. I please to our council - listen to your residents they do not not want the masses of development that you are proposing
Include files	
Number	Question 33

ID	LPIO3183
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	There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. 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 I concur with the contention 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 only winners with any these 3 proposals would be the developers.
Include files	
Number	Question 33
ID	LPIO3194
Full Name	Mr John Walker
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 full
Include files	
Number	Question 33
ID	LPIO3284
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	No

Your response - Please add your response here	See also our answer to Q16 stating our view that Option 3 is the correct route to follow. We consider that Option 1 (602 p.a.) is not an appropriate level of growth to consider in the Local Plan since it would fail to meet the needs identified in the South West Hertfordshire Strategic Housing Market Assessment, and would be a significantly short of the 1,000 to 1,100 target expected to be set by the Government applicable from September 2018. For these reasons a Local Plan based on Option 1 would fail to meet identified needs and would be highly likely to be found unsound.
Include files	
Number	Question 33
ID	LPIO3348
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	The projected growth figures should be reviewed in the national context. Surely we should have a national strategy that promotes growth outside the London catchment area, coupled with the development of a series of new towns (e.g. along the newly to be reopened Oxford to Cambridge railway corridor). It makes no sense to overdevelop existing towns.
Include files	
Number	Question 33
ID	LPIO3401
Full Name	Mr Phil Sawyer
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 33
ID	LPIO3446
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	I support option 1A which centers the lowest housing figure within the main towns with the greatest infrastructure and leaves the green belt alone
Include files	
Number	Question 33
ID	LPIO3490
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	Option 1 only
Include files	
Number	Question 33
ID	LPIO3520
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	No consideration has been given to capacity issues or infrastructure constraints in Berkhamsted which cannot cope with more housing
Include files	
Number	Question 33
ID	LPIO3545
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	Lower levels in Berkhamsted should also be considered - optimum rather than maximum
Include files	
Number	Question 33
ID	LPIO3593
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>There is not enough space already in Dacorum for 602 homes a year. These figures should be revised downwards and National Government ought to support this reduction because this area cannot cope with more. The threat of developers winning rights over land is just that - a threat, and should not be used to force people responding to this consultation into choosing an option.</p> <p>No Green Belt should be redesignated, and Government is currently in process of creating a law that will protect Green Belt (Private Members Bill). Government strategy to protect Green Belt is also being discussed. Dacorum Borough and Herts County Councils should be firm and not allow development in Green Belt, instead save it for future generations.</p>
Include files	
Number	Question 33
ID	LPIO3658
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	No. See reply to Question 16. The figure should be no higher than 430 p.a.
Include files	
Number	Question 33
ID	LPIO3722
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	The previous target of 430 homes per year should be adhered to. It is not feasible or sustainable to achieve a higher figure. There is not the infra structure to support any further development . GP surgeries, roads, schools are already full to capacity and this ad hoc approach leads to distress and upset to all concerned.
Include files	
Number	Question 33
ID	LPIO3730
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	See previous answer
Include files	
Number	Question 33
ID	LPIO3767
Full Name	Mr Richard Sidwell
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 rural land or green belt land must be totally & absolutely resisted. Infill and brown field sites must be totally exhausted before this is even thought about. Wlthout countryside and open space, towns will coalesce into one huge urban sprawl.
Include files	
Number	Question 33
ID	LPIO3791
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	The figures are over ambitious and will only lead to further problems as the support network won't be there.
Include files	
Number	Question 33
ID	LPIO3817
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	Kings Langley's infrastructure cannot cope with any of these options
Include files	
Number	Question 33
ID	LPIO3844
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	The impact of Brexit must be consider, option 2 and 3 will change the borough with the proposed 27% increase in homes by 2036 which will change our town into a city and villages into towns. I don't agree with the growth levels way too high, I would suggest 516 homes at year being the average from the current level to the governments draft figure.
Include files	
Number	Question 33
ID	LPIO3855
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	Option 1 is the least unacceptable, but still proposes excessive numbers of homes in areas of limited capacity.

Include files	
Number	Question 33
ID	LPIO3927
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	Yes
Your response - Please add your response here	Please see paragraph 2.35 and 2.36 in attached report.
Include files	Local Plan Issues and Options (11)
Number	Question 33
ID	LPIO3978
Full Name	Mr Tim Varley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	See response to Q16 above.
Include files	
Number	Question 33
ID	LPIO3997
Full Name	Mr John McCombe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Anything above Option 1 will be unsustainable and probably undeliverable.
Include files	
Number	Question 33
ID	LPIO4034
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	Yes
Your response - Please add your response here	Please see paragraph 2.35 and 2.36 in attached report.
Include files	Local Plan Issues and Options (27)
Number	Question 33
ID	LPIO4042
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 33
ID	LPIO4089
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	Yes
Your response - Please add your response here	Please see paragraph 2.35 and 2.36 in attached report.
Include files	Local Plan Issues and Options (43)
Number	Question 33
ID	LPIO4151
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	It is unreasonable to set a housing target above numbers achievable. DBC assessed this to be 476 new dwellings

per year. That said, the absolute maximum should be that stated in Option 1 (602 homes/yr). I would opt for Option 1A as there is a need for social housing in Tring, Berkhamsted and Hemel Hempstead. Please note that this Option 1A does not mean I approve of developing the Shendish site (site reference HH-h3) as this is part of Kings Langley and not Hemel Hempstead. My reasons for choosing Option 1 A are (particular reference to Kings Langley):

1. The schools in Kings Langley are already oversubscribed
2. Loss of amenity and valued landscape: 3 of the Kings Langley village sites have public access and all 4 have an abundance of wildlife and open spaces. Furthermore, Wayside Farm is only 1 of 2 Jersey herds in the county, and Rectory Farm is an area of outstanding natural beauty
3. Lack of suitable road and public transport network at current housing levels: there are already daily traffic jams through the village on the way to the M25 - from Tring, Berkhamsted, Hemel Hempstead, Chipperfield and Apsley. any further development will simply exacerbate an already critical problem
4. Railway provision: many residents rely on Kings Langley Station to commute to London. There is already standing room only on morning trains. More housing will make this worse, and could result in trains being incapable of carrying the extra passengers.
5. GP surgeries are already over capacity, with long waits for appointments
6. If any of the proposed major developments around Kings Langley are approved, there will be a blurring of village boundaries (coalescence)
7. Likewise, the proposals in all the other Options will result in the loss of village social and historic character and identity
8. The Chancellor's Autumn statement included clear guidance that there should be strong protection of the Green Belt.

Furthermore, Option 2 is based entirely on forecasts that do not include any known surveys of 'local needs', but simply extrapolate from recent rapid development in Dacorum. This road development has led to road and rail transport operating at peak capacity, which makes life in the Borough less attractive and therefore negatively impacts actual growth in the future.

Option 3: there seem to be no clear reasons for considering this.

Include files	
Number	Question 33
ID	LPIO4157
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	But care should be taken to ensure that “no longer needed for employment” is not an excuse for non-renewal of lease and opting for the more profitable redevelopment for over 55s housing.
Include files	
Number	Question 33
ID	LPIO4164
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	Yes
Your response - Please add your response here	Please see paragraph 2.35 and 2.36 in attached report.
Include files	Local Plan Issues and Options (59)
Number	Question 33
ID	LPIO4200
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	Don't build more than is absolutely necessary and not in villages that doesn't have the capacity or infrastructure.
Include files	
Number	Question 33
ID	LPIO4215
Full Name	Miss D Bryant
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>HH h3 - Why has Shendish been included in the Hemel Hempstead figures when it is Kings Langley?</p> <p>Even 1A 602 is not sustainable</p> <p>My father's family are from Bovingdon and my mother's from Kings Langley both going back generations. In my lifetime (53yrs) I have already seen how housing developments listed below together with the M25 (Oct 1986) and A41 Bypass (Aug 1993) have already changed Kings Langley dramatically;</p> <p>Abbott Printers Abbott Number 2 Engineering The Ovaltine Kings Langley Engineering Tooveys Mill</p> <p>The 3 local John Dickinson's Sites located at Nash Mills, Apsley and Home Park</p> <p>John Dickinson's Football Pitch (now Roman Gardens)</p> <p>Having the A41 Bypass was supposed to protect Kings Langley from the traffic and keep it as a village.</p> <p>Therefore it is without doubt that building on our Green Belt will change Kings Langley forever, it will no longer be a village!</p> <p>We should be holding on to our heritage and the green belt not destroying it. Wayside Farm (one of only 2 remaining dairy farms in Hertfordshire) should remain, Charlie has worked so hard to turn things around, farming should be supported. The Wayside Farm adds to the village ethos.</p> <p>These proposals will affect the trade to our High Street Shops parking is already a problem and the traffic situation will deteriorate further. During commuting times/school runs the traffic is already nose to tail, queuing the length of the High Street through to the M25. This will become a constant problem throughout the day - a grid locked High Street. People will not want to queue through the village and then wait for a parking spot they will just head straight to Supermarkets.</p> <p>There are 2 Councils in Kings Langley they should try communicating with each other – Kings Langley should be looked at as whole.</p> <p>I chose to remain in Kings Langley because I want to live in a village, if I wanted to live in a sprawling built up area I would have purchased a property in a town.</p> <p>I am very sad that Kings Langley will lose its identity and just be part of Hemel Hempstead and eventually Watford as once it starts it doesn't stop!!</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 33</p>
<p>ID</p>	<p>LPIO4254</p>
<p>Full Name</p>	<p>Ms Alison Sams</p>
<p>Company / Organisation</p>	
<p>Position</p>	
<p>Agent Name</p>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Only option 1 is viable for our village of Kings Langley
Include files	
Number	Question 33
ID	LP104255
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	There is an inadequate assessment of capacity, infrastructure constraints and the consequences are detrimental. The idea of building on Green belt and getting rid of Wayside farm is a travesty.
Include files	
Number	Question 33
ID	LP104263
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	Whilst I would support Option 1 there is no need to use Green Belt in Kings Langley at Shendish, Hill Farm, Wayside Farm and Rectory Farm without first using land within existing towns and village boundaries, existing allocations, proposed infilling and an allowance for windfalls, plus the identification of previously developed and brownfield sites with the potential for redevelopment.
Include files	
Number	Question 33
ID	LP104328
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	
Include files	
Number	Question 33
ID	LPIO4381
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	Should be based on an assessment of what the infrastructure can accommodate, the constraints of the area and the character we wish to retain. If we want Hemel to extend to Aylesbury growth rate could be enormous but suspect the voters don't.
Include files	
Number	Question 33
ID	LPIO4391
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	Option 1, is the only viable option. With a new policy to rethink the way we live, not where we live. smaller communities, shared resources, smaller electric shuttle routes.
Include files	
Number	Question 33
ID	LPIO4419
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	No figure equates to Brownfield development only.
Include files	

Number	Question 33
ID	LPIO4489
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	The increase in numbers of all three options would have detrimental effects on Kings Langley and the surrounding area.
Include files	
Number	Question 33
ID	LPIO4528
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	It all seems like 'smoke and mirrors' to me, as Berkhamsted has already built significantly above its numbers coming forward from the last plan and not proper analysed figures are ever shown for those plans already approved that still seem to be part of these numbers.
Include files	
Number	Question 33
ID	LPIO4580
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. consideration should also be given to keeping to the current target.
Include files	
Number	Question 33
ID	LPIO4603
Full Name	Dr Alasdair Malloy

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 Belt Land.
Include files	
Number	Question 33
ID	LP104648
Full Name	Miss Anna Nickalls
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 here have to include the development of greenbelt. Looking at Urban Capacity would allow for a smaller population increase (whilst staying above the current target set out in the Core Strategy) but would concentrate on only brownfield sites.
Include files	
Number	Question 33
ID	LP104748
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	Infrastructure constraints have not been adequately assessed.
Include files	

Number	Question 33
ID	LPIO4753
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	Infrastructure constraints have not been adequately assessed.
Include files	
Number	Question 33
ID	LPIO4789
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	There is an inadequate assessment of capacity , infrastructure constraints and thus the consequences and ability to deliver any of the 3 growth options considered.
Include files	
Number	Question 33
ID	LPIO4800
Full Name	Mrs Lydia Berman
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 opt for the lowest number, but we also need evidence of the property need in the area. We don't have the fast paced property market in Kings Langley as in other parts of the country, and therefore have properties on the market for rent and sale for months, I would therefore like to see a fair appraisal of the requirements, and the idea of more than doubling Kings Langley, is over the top. We will completely lose the character and open feel that people move here for, and increase further the impact on our strained infrastructure - overcrowded

	trains, barely any car parking, no police station, no A&E etc. This all seems to be too much for the area to sustain.
Include files	
Number	Question 33
ID	LPIO4824
Full Name	Dr Jane Leithead
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option 1 would be most acceptable, but I also think that the effects of Brexit have not been taken into account, and anticipate that demand for housing will change with the move of certain industries away from London.
Include files	
Number	Question 33
ID	LPIO4867
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	<p>We have set out in response to Question 16, that we do not necessarily consider that the use of the figures which come out of the Government's consultation document are reasonable to use at this time. The consultation on the document 'Planning for the Right Homes in the Right Places' has recently closed and will now be subject of further scrutiny and refinement and the outcome of this and requirements of Local Authorities as a result are not yet known. It is therefore premature to be using the figures which arise from this as a basis for the consideration of the levels of housing growth in this Plan.</p> <p>It is recognised and supported that the Plan should look to achieve growth and, as such, an increase from the current Plan figures should be sought to reflect the ongoing demand for new homes. These levels of growth should recognise that there will be differing requirements and pressures in terms of infrastructure and other demands, which need to be considered and balanced against the level of housing growth in this Plan.</p> <p>The figure of 602 homes a year is based on an assessment of local need, and represents a safe level which could be delivered with minimal development of</p>

	<p>Gren Belt land. This figure does not however reflect the additional evidence in terms of market factors, which show that a higher housing figure is likely to be needed to meet the full extent of demand in the Plan period. It is not therefore appropriate to pursue this figure of 602 homes per annum, which is known not to meet local need. The use of this figure would be likely to result in a short term need for another Plan review, creating ongoing uncertainty.</p> <p>There is a significant step change from this lower level figure of 604 to the higher growth figure of 1,100 homes a year. It is noted that this higher figure comes from the formulaic calculation set out in the recent Government consultation document. It has already been identified in our representations that the use of this document, which was in consultation draft form, is premature at this stage.</p> <p>Furthermore, even the consultation document itself suggested that the growth figures may be capped to an uplift of 40% from existing Plans in certain circumstances (likely to be applicable to Dacorum) therefore there is not likely to be any circumstance in which this highest figure is required at this time. It is not therefore a suitable long-term proposition to use this higher figure at this time, which is also likely to be extremely challenging to achieve, requiring significant release of Green Belt land.</p> <p>The figure of 756 homes per year is supported by quantifiable evidence of housing growth and need in the SHMA area. It demonstrates a commitment to a step change in housing delivery in the local area. It is realistic about the extent of development and sites outside of the existing towns and villages which will need to be identified and developed to meet this, but is deliverable without significantly altering the character of the area. This figure is supported, provided that adequate flexibility is included in relation to the sites which are identified to deliver this and the timing of their delivery.</p> <p>The figure of 1,100 homes per annum is considered too significant a step change in housing delivery at this time. There is no quantifiable need for this level of development at present, therefore this figure is not supported.</p>
Include files	
Number	Question 33
ID	LPIO4892
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	You can only build any of these options if you improve the infrastructure and services within the area before significant new houses are built.

	Also how do you know what will happen in 20 or 10 years time. How can you predict that the same number of houses should be built each year. Should there not be a gradient to the houses built each year.
Include files	
Number	Question 33
ID	LPIO4926
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 DBC own figure of 476 houses per year. Any number above this cannot be supported given constraints in developing the appropriate infrastructure and encroaching onto green belt and open farmland with the resultant detriment to the quality of life of existing residents of the borough.
Include files	
Number	Question 33
ID	LPIO4930
Full Name	Mr Simon Scott
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Again Mr. Case states its well "There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. 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. 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.”

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 this should be factored in. 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 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 would bring the numbers up to or very close to the ‘draft Government figure’.

Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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 even up to 2025, depending on when the new plan was adopted.”

Include files	
Number	Question 33
ID	LPIO4971
Full Name	MR Russell Berman
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 opt for the lowest number, but we also need evidence of the property needs in the area. We don't have the fast paced property market in Kings Langley as in other parts of the country, and therefore have properties on the market for rent and sale for months, I would therefore like to see a fair appraisal of the requirements, and the idea of more than doubling Kings Langley, is over the top. We will lose the character and open feel of the area, which was specifically why that people moved here. This development will put further pressure on our already strained infrastructure - overcrowded trains, limited car parking, no police station and no local A&E etc.
Include files	
Number	Question 33
ID	LP104985
Full Name	Ms Anette Corbach
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 33
ID	LP104986
Full Name	Ms Anette Corbach
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 33
ID	LP105046
Full Name	Mrs Rose 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 housing figures reflect the desire for new housing without realistic appraisal of the means to provide the infrastructure necessary to accompany that housing, nor the detrimental environmental consequences associated with growth.
Include files	
Number	Question 33
ID	LP105051
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>(a) 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> <p>(b) 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 further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.</p> <p>(c) 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 of 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,</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.”. 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.

(d) 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 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 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.

(e) DBC’s 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 the numbers in appropriate areas would bring the total either up to, or very close to, the ‘draft Government figure’.

(f) Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately 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’ time, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. (For the sake of clarity, BRAG is not suggesting that adoption of the plan should be left until the last date, but simply to offer that as an example.)

Include files	
Number	Question 33

ID	LPIO5055
Full Name	Mrs Nicola 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 33
ID	LPIO5074
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	The housing targets are unrealistic and far too high.
Include files	
Number	Question 33
ID	LPIO5089
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	<p>Option 3 is clearly excessive and lacks credible evidence in the face of current macro-economic and socio-political uncertainties.</p> <p>Option 2 is also well beyond what is feasible to accommodate in a predominantly rural borough with limited transport links. It is also unclear whether the driving forces behind this local need are truly 'local'.</p> <p>Option 1 is the 'least worst' of the three options.</p>
Include files	
Number	Question 33
ID	LPIO5150
Full Name	Miss michelle hilditch
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 they are only reasonable if you take them in isolation ie what the central government needs are to house the increasing population. If you then apply these numbers to the real world ie the areas proposed you can clearly see that these local areas simply cannot carry even the lower quotas without severe impact.
Include files	
Number	Question 33
ID	LPIO5223
Full Name	Mr Gareth Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The urban limit of 476 should be the upper limit.
Include files	
Number	Question 33
ID	LPIO5224
Full Name	Mr Gareth Morris
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Both options should still be considered.
Include files	
Number	Question 33
ID	LPIO5280
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	Only option 1 is acceptable but only on the basis that it does not require the release of Green Belt land as the plan does not provide exceptional circumstances to warrant such release.
Include files	
Number	Question 33
ID	LPIO5297
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	Bearing in mind that future demand will always change, and 20 years is a long time.
Include files	
Number	Question 33
ID	LPIO5339
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	Only option 1 is acceptable. Brownfield sites must be the target for any building. With the implications of Brexit being a total unknown in terms of housing needs and also our need to produce our own foods, it is short sited to continually re designate agricultural and greenbelt land. I do not want to live in a suburb, I moved here to be part of village life.
Include files	
Number	Question 33
ID	LPIO5370
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	Firstly, the council's own figures have no rationale and the associated calculations, assumptions and confidence intervals of their estimates are published nowhere. So there is no basis for these figures. Secondly, the governments increase is based on increased building in unaffordable areas. We should simply dramatically increase the number of affordable and social housing built until this is offset, requiring less overall building. These figures also do not account for actual capacity in the area, including geography and infrastructure.
Include files	
Number	Question 33
ID	LPIO5402
Full Name	miss tracy flint
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option 1, leave green belt sites alone.
Include files	
Number	Question 33
ID	LPIO5403
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	<p>There is little point assessing Option 1 - 602 homes per year. This figure is based on the new standardised methodology but it is a capped figure- that cap being against an out-of-date and historically low housing target. The SHMA demonstrates that the figure is far too low and would not even meet the need assessed under the current methodology. As such the figure is far too low and cannot be considered a reasonable alternative.</p> <p>It is useful to consider the National Infrastructure Commission (NICS) report into the Cambridge to Oxford Arc called 'Partnering for Prosperity'. The report paints a familiar picture of the difference between average earnings and average house prices within the arc. This picture is familiar and relevant to Hertfordshire. The report states; "These estimates of housing need exceed local estimates of objectively assessed needs developed by local authorities through their Strategic Housing Market Assessments. This discrepancy should not be a surprise – there is good reason to believe that the methodology used in undertaking assessments of local</p>

	housing need can be conservative and can mask high levels of unmet need. Although local authorities are not consistent in their approach to calculating need, many use trend based household projections which are based on recent migration trends. In many cases historic migration has been suppressed by low housing supply, leading to underestimates of migration in areas with high levels of demand and growing housing needs. This is a national issue, but of particular relevance to the study area given high levels of demand for housing."
Include files	
Number	Question 33
ID	LPIO5420
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	<p>All numbers of additional housing (your emphasis) are simply irresponsible, impractical and neither desirable nor reflective of sustainable development. Any of them would result in further destruction of existing levels of services, however poor, and further deterioration of living service for all existing residents.</p> <p>Given your proposals, this is particularly the case for Berkhamsted which has already seen excessive growth over the past ten years, so no further houses in Berkhamtsed are acceptable.</p>
Include files	
Number	Question 33
ID	LPIO5467
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	<p>The Council's Core Strategy (430 homes/yr) was adopted only 4 years ago after lengthy research and assessment of local needs, paid for by local taxpayers.</p> <p>Option 1 (602 homes/yr) is 40% higher than the Core Strategy. The Council should work to justify its Core Strategy on the basis of existing infrastructure limitations, and the ongoing lack of means to remedy them. At best, the higher figure of Option 1 should be considered as the upper limit for meeting government requirements.</p>

	Option 2 is based entirely on forecasts, possibly projecting from the rapid growth in new homes built on Dacorum's brownfield sites in recent years. As a direct consequence of those developments, road transport links to M25 and rail links to London are now operating at peak hour capacity, making life in the Borough increasingly unattractive. This in turn would have a negative impact upon forecasts. No clear reasons are given for considering Option 3.
Include files	
Number	Question 33
ID	LPIO5516
Full Name	Mr David Bryant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	were do these figures come from when the council has a waiting list of 10000 but only 2000 actively seeking accommodation. also in all the plans that have been put forward I have not seen that the council is actually providing "council housing" to elevate the waiting list, only a % of each site with low cost housing . What does that actually mean and how much is the rent . these proposals will not benefit the people who live here already on low incomes that would love a council property, but bring more people in from London selling there million pound plus houses, so increasing property prices here, so pricing locals out of the market
Include files	
Number	Question 33
ID	LPIO5530
Full Name	Mrs Kristina Neville
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Please recalculate the number of houses required, this area's infrastructure is already challenged. Green Belt should be protected.
Include files	
Number	Question 33
ID	LPIO5564
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	Option 3 and the housing growth target of 1,100 homes a year reflects the governments new draft standard formula for assessing housing need within Dacorum and will ensure the local plan accurately meets current and future housing need going forward. Should the government's proposed formula that forms part of the consultation document 'Planning for the right homes in the right places' be adopted, those local authorities with a core strategy of 5 years or older which would include Dacorum would be required to provide 1,000-1,100 homes a year. Progressing with a local plan that does not accurately take into account the long term housing need would risk the housing delivery targets contained within the draft local plan being found unsound at a later stage.
Include files	
Number	Question 33
ID	LPIO5618
Full Name	Mr Michael Ridley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	In view of the considerable reservations already expressed, the Growth Levels are unrealistic to achieve without serious consequences
Include files	
Number	Question 33
ID	LPIO5656
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	Target should be 500. I note in Appendix B a target of 476 equates to no additional release of Green Belt land.

	Increased use of all council owned land for housing and greater emphasis on identifying and using Brownfield sites would result in minimal need, if any, requirement for housing development on Green Belt land.
Include files	
Number	Question 33
ID	LPIO5697
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 33
ID	LPIO5755
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	<p>In an area which is covered by important designations, like the Chilterns AONB, the process of establishing a housing figure in a local plan is supposed to involve OAN plus a process of considering constraints, which may well lower the appropriate amount of growth. The Council has failed to carry out that process and is simply accepting pure OAN, unmoderated by constraints. This does not match the Issues and Options document's own cog diagram on page 45, and it does not comply with the NPPF which explains at para 14 that Local Plans should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and unless specific policies in the Framework indicate development should be restricted. Examples of areas where development should be restricted are listed in footnote 9 of the NPPF. They are abundant in Dacorum BC, where there are Special Areas of Conservation, many sites designated as Sites of Special Scientific Interest, significant areas of land designated as Green Belt and Area of Outstanding Natural Beauty, designated heritage assets; and locations at risk of flooding.</p> <p>The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number. The question should not be</p>

	<p>which alternative OAN figure should the Council adopt, but how much of that growth can be accommodated while delivering sustainable development and protecting features of acknowledged importance like the Chilterns AONB, nationally protected as one of the country's finest landscapes, and with the same level of protection (the highest) as National Parks (NPPF para 115). 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.html</p>
Include files	
Number	Question 33
ID	LPIO5819
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	Have we challenged the government on its housing growth plans? It would be very easy to roll over and say "we have to", but central government's record of success on these things is poor.
Include files	
Number	Question 33
ID	LPIO5897
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.
Include files	
Number	Question 33
ID	LPIO5933
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	<ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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.
Include files	
Number	Question 33
ID	LPIO6001
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 33
ID	LPIO6005
Full Name	Mr Quentin Ross-Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Need lower targets to sustain the environment.
Include files	
Number	Question 33
ID	LPIO6056
Full Name	Georgina Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	While accepting some development must go ahead, I would prefer Option 1: possibly Option 2; but Option 3 would mean that the smaller towns losing their individual identities.
Include files	
Number	Question 33
ID	LPIO6093
Full Name	Mr Richard Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Although many studies about numbers they seem to bear no relationship to National population growth which is considerably less than the proposal</p> <p>It seems time to revert to basics and ask when net immigration is going down and population growth in the plan period</p> <p>I quote below from the Office of National Statistics which is predicting a lower growth than we are being asked to absorb in area of low growth compared to Northern Power House etc</p> <p>In 2016 the population of the UK was 65.6 million, its largest ever.</p> <p>The UK population is projected to continue growing, reaching over 74 million by 2039.</p>
Include files	
Number	Question 33
ID	LPIO6095
Full Name	Mr Richard Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Although many studies about numbers they seem to bear no relationship to National population growth which is considerably less than the proposal</p> <p>It seems time to revert to basics and ask when net immigration is going down and population growth in the plan period</p>

	<p>I quote below from the Office of National Statistics which is predicting a lower growth than we are being asked to absorb in area of low growth compared to Northern Power House etc</p> <p>In 2016 the population of the UK was 65.6 million, its largest ever.</p> <p>The UK population is projected to continue growing, reaching over 74 million by 2039.</p>
Include files	
Number	Question 33
ID	LPIO6100
Full Name	Miss Helen Barham
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Option 1 is the only viable option.</p> <p>There should be more consideration given to a National strategy to bring jobs to areas that are dying. Building in this area to feed London just results in more traffic and puts strain on a rail network that can not increase in capacity.</p> <p>Building in Kings Langley will substantially affect the character of the village and it will no longer be a semi rural area.</p>
Include files	
Number	Question 33
ID	LPIO6102
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	<p>The proposed growth figures have very flaky foundations and there is no reference to the design capacity of our existing infrastructure or its ability to cope with additional growth. Unlike old industrial area of the country, Dacorum does not have a well defined 'natural resource' that accounts for its economic attractiveness. Proximity to London is likely to be the key factor. In consequence, the old adage 'build them and they will come' will always hold true. Over time, successive governments of all political persuasions have failed dismally to arrest the growth in the South East or stimulate significant economic growth in other parts of the country. To</p>

	prevent further congestion, perhaps Dacorum, in tandem with neighbouring councils should take a stand and oppose future growth.
Include files	
Number	Question 33
ID	LPIO6106
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	This level of growth does not fit with the needs of the village or surrounding areas. It will not improve anyone's lives - just cause chaos and misery. Greenbelt should not be considered until all brownfield sites have ben utilised.
Include files	
Number	Question 33
ID	LPIO6123
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	None of the figures are supportable or sustainable It makes no sense to build housing in an area where non of the infrastructure, physical or social, is capable of supporting growth. The term 'greenfield sites that have already been earmarked' makes a mockery of the consultation.
Include files	
Number	Question 33
ID	LPIO6127
Full Name	Steve Pitts
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No

Your response - Please add your response here	Does the local housing provision really need to grow by as much as 600 homes per annum, especially given that much of the local infrastructure is already creaking at the seams?? We already have to fight our way out through Kings Langley village to get to Watford hospital, the A4251 feels as busy during rush hour as it did before the A41 bypass was built and the local secondary school is already oversubscribed. [sarcasm]Sounds like a perfect location for more housing[/sarcasm] Housing, what's more, that our own children will not be able to afford.
Include files	
Number	Question 33
ID	LPIO6142
Full Name	Mrs Rosemary North
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 33
ID	LPIO6143
Full Name	Mrs Rosemary North
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 33
ID	LPIO6146
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 33
ID	LPIO6193
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	The current infrastructure can not cope at the moment. By developing large number of housing it will just compound the problem. We should not be having to agree to a certain number to allow for the overspill of London
Include files	
Number	Question 33
ID	LPIO6210
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>I prefer Option 1 - Draft Government Figure which equates to 13,846 homes, whereas para 10.1.3 says that there are suitable sites available for a housing capacity of about 10,940 new homes up to 2036 using brownfield sites, together with some greenfield sites that have already been earmarked for development.</p> <p>Para 10.1.5 says any growth above this 10,940 figure will require the use of greenfield sites outside of the existing boundaries of our towns and large villages.</p> <p>But have all brownfield sites been identified?</p> <p>You are still inviting submissions promoting sites for development. Until all brownfield sites and density options have been fully identified and considered it must be premature to say that any growth above 10,940 will require the use of greenfield sites.</p>
Include files	
Number	Question 33
ID	LPIO6261
Full Name	Mr Dalton
Company / Organisation	Land and Partners Limited
Position	Project Planner

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Option 3 is the most reasonable starting point as it will be the requirement according to the Government's draft standard formula. The plan is scheduled to be submitted after the Core strategy turns 5 years old. As paragraph 6.1.14 states, the figure of 1,000 to 1,100 would need to be used after the plan is 5 years old. Therefore the latest available evidence suggests 1,000 to 1,100 would be the most sound figure to use as a starting point.</p> <p>Clearly each settlement has to be assessed in terms of its capacity and this will dictate the amount of development deliverable in each. Land and Partners controls land at Markyate (My-h2 Land at Pickford Road) outside of the Green Belt and AONB and this site is one example of a location where growth can be accommodated sustainably without harm to the landscape.</p>
Include files	
Number	Question 33
ID	LPIO6274
Full Name	Mr Brian Goddard
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 33
ID	LPIO6286
Full Name	Ms Ann Hetherington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>More houses are needed but we need to see plans for the infrastructure to back it up from health, roads, services, education etc. There needs to be a co-ordinated approach across departments as I understand the council is not responsible for all areas.</p> <p>Until that point, I would suggest we plan for the minimum required housing.</p>

Include files	
Number	Question 33
ID	LPIO6294
Full Name	Mr Scott Bennett
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 33
ID	LPIO6364
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 I don't agree with picking random Figures
Include files	
Number	Question 33
ID	LPIO6431
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	The algorithm used to provide the data was based pre-brexite, the migration figures since have seen a downturn, are the figures required at the documented levels.
Include files	
Number	Question 33
ID	LPIO6438
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	New homes should be built when required.
Include files	
Number	Question 33
ID	LPIO6478
Full Name	Mrs Gillian Lambourne
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	All three proposals indicate substantial building on precious greenbelt. This surely must be kept to an absolute minimum until all possible brownfield sites have been identified, examined and then used where possible. Greenbelt is the corridor between towns and villages, provides a home for wildlife (which cannot thrive and will decline in isolated pockets of greenbelt), provides well being for locals and above all gives this nation of ours the ability to grow its own FOOD! Prices are rocketing especially in relation to imported goods and we need to be able to feed ourselves and not depend on others - especially as climate change is having an impact on all producing nations. Also where is the related thought to infrastructure planning, pressure on schools, health facilities, elderly care etc. I would favour the lowest number of new homes for these reasons and would also suggest an proactive investigation into the identification of brownfield sites and not just ask for them to be put forward.
Include files	

Number	Question 33
ID	LPIO6507
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	Reasonable considering the SHMA have proposed option (b)
Include files	
Number	Question 33
ID	LPIO6516
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 current growth target of 430 cannot be delivered without significant infrastructure overhaul; let alone any further increase. The existing infrastructure in Dacorum cannot cope. For further details please refer to proviso specific comments made.
Include files	
Number	Question 33
ID	LPIO6634
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	<ul style="list-style-type: none"> The above states: <ol style="list-style-type: none"> Allowing housing on land which is no longer needed for employment uses <p>Yet, the proposal includes building on greenbelt land. Kings Langley should be preserved and not coalesce into Hemel Hempstead. The infrastructure and services will not be able to cope.</p>
Include files	

Number	Question 33
ID	LPIO6701
Full Name	Mr Alan Horn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The figure of 756 is the locally assessed housing need, and should be the only growth level considered.
Include files	
Number	Question 33
ID	LPIO6735
Full Name	Miss Oonagh Gilfillan
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 33
ID	LPIO6763
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><p>With the exception of Option 1A, all options are inappropriate.</p><p>The increase from the current yearly average of 404 to 602 homes a year is already considerable.</p><p>Exceeding this rate would surpass the area's capacity in terms of public services and infrastructure and, therefore, would not be sustainable.</p><p>Even at the current rate of home building, infrastructure improvements have been virtually absent. If more schools, hospitals and roads are to be provided, the loss of green space, biodiversity and the coalescence of villages and towns would be unavoidable.</p><p>Dacorum falls within the London commuter belt, served by the west-coast mainline rail line which is already at full capacity at the peak.</p>

Include files	
Number	Question 33
ID	LPIO6795
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	The growth figures should only reflect current local needs and that the current local infrastructure can support.
Include files	
Number	Question 33
ID	LPIO6798
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	The maximum provision should be allowed for in order to better provide sustainable services and to reduce housing costs.
Include files	
Number	Question 33
ID	LPIO6831
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	Should we be planning for growth at all? If everyone on earth lived an average northern European lifestyle we would need 3 plants to absorb the greenhouse gas emissions emitted. Britain as signed up to the Paris Agreement whereby we have to reduce our greenhouse gas emissions. The ambition of growth and carbon reductions are mutually exclusive and this needs to be communicated back to the Government. Planning to increase population can only lead to increasing

	greenhouse gas emissions. Is planning for population growth even legal?
Include files	
Number	Question 33
ID	LPIO6868
Full Name	Mrs Juliette Kent
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 33
ID	LPIO7025
Full Name	Mr Mark Bullard
Company / Organisation	Pendley Sports Centre
Position	Secretary
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	n/a
Include files	
Number	Question 33
ID	LPIO7033
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	all of the numbers are not sustainable or achievable with the green belt and AONB AVDC is taking numbers from high Wycombe and Chiltern for similar reasons
Include files	
Number	Question 33
ID	LPIO7040
Full Name	Mrs Jenna Selby

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Calculations of housing need (national and local) need to be reviewed in light of Brexit. One of the key points was to reduce immigration?
Include files	
Number	Question 33
ID	LP107123
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>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> <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 Q33 - FULL DOC ATTACHED TO Q46

Question 33

Do you agree that the three growth levels proposed are the most reasonable to consider?

No

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

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.

□

	<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 which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <p><input type="checkbox"/></p> <p>Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO7334
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>

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33

Do you agree that the three growth levels proposed are the most reasonable to consider?

No

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

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.

□

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 would bring the numbers up to

or very close to the ‘draft Government figure’.

□

	<p>Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example</p>
Include files	
Number	Question 33
ID	LPiO7399
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>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> <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 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.</p>
Include files	
Number	Question 33

ID	LPIO7470
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	Answer – NO Option 3 [Upper Government figure] should not be included. It is clearly undeliverable – both in terms of homes and infrastructure, not to mention funding. The inclusion of Option 3 is justified on the grounds that the need figure may increase significantly above its current level. If such an unlikely need does arise at some future time then it can be reviewed at that stage and quickly rejected.
Include files	
Number	Question 33
ID	LPIO7680
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	No Capacity and infrastructure constraints have not been properly assessed, so the ability to deliver any of the three growth options is unknown.
Include files	
Number	Question 33
ID	LPIO7822
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 33
ID	LPIO7920
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 33
ID	LPIO7959
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 Q33</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> <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>

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 "*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.

□

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

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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 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 would bring the numbers up to

or very close to the 'raft Government figure'

Claims that Option 3 will have to be adopted if "he Government' new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. The Government consultation categorically

does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum' plan immediately it

becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their

plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption

of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO8008
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>See the response to Q16. In summary, It is neither reasonable nor required by Government to set a housing target above that which is achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. Even this estimate underestimates the contribution from “windfalls”, which continue to arise at around 100 each year. It is accepted that at some point in the future this number may reduce, but full rather than grudging partial recognition of their contribution must be made.</p> <p><i>[Response to Q16: It is neither reasonable nor appropriate to set a housing target above what is achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. DBC quoted 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.</i></p> <p><i>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 reassessment 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”, whose paragraph 9 states 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.”</i></p> <p><i>There are well-founded reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, and a confusion between need and demand – the latter being almost completely driven by the volume house-building</i></p>

	<p><i>industry. The constraints of the Dacorum area mean that the Urban Capacity has to be the starting point, particularly given the Governments very recent strong commitments to preserving the Green Belt.</i></p> <p><i>The draft plan paragraph 6.1.14 is dangerously misleading. The Government consultation referred to above 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. Its inclusion seems somewhat revelatory of Dacorum planners' mindset.]</i></p>
Include files	
Number	Question 33
ID	LP108102
Full Name	MRS MARY THOMSON
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	2. I see no reason why DBC should need to consider any option other than that laid down by Government, i.e., plus 40% and Option 1
Include files	
Number	Question 33
ID	LP108182
Full Name	Mr Adrian Howe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	As Potten End residents we have seen the level of development proposed in the Local Plan to 2036 and are horrified. The levels proposed in Option 1 (13,800 homes) are bad enough even if 1B (focussed on Hemel Hempstead) was adopted. With the result that the nature of the area would be radically changed and we have little confidence that essential infrastructure, already under severe pressure, will keep pace. Our health service provision is remote and often inadequate, and local roads are already overcrowded. If the higher development levels of Option 2 (17,400) or god forbid Option 3 (25,300) are adopted we may as well give up now. We will take some photographs of the green belt to show our grandchildren, as it will virtually disappear.

Include files	
Number	Question 33
ID	LPIO8221
Full Name	Mrs Suzanne Nixon
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>HOW MANY HOUSES</p> <p>I understand that Westminster requires that local councils meet given targets for the provision of new housing. "Whatever figure is finally agreed, it will represent a substantial increase over current housing targets and historic rates of building in the area."</p> <p>I understand that the proposed government targets based on level of need are lower than those proposed by Dacorum. Why is this?</p> <p>I would challenge Dacorum to opt for the lowest number of new houses that would be acceptable within these constraints. In my view, Westminster should be investing in development of areas outside of the prosperous Southeast, but that is another argument.</p>
Include files	
Number	Question 33
ID	LPIO8360
Full Name	MR T AMSDEN
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 fundamental premise is that Dacorum is already developing at an unsustainable pace. No amount of development in the plan period could satisfy local need, because despite your best intentions the housing market in the area is driven by purchasers from elsewhere who are actively targeted by estate agents. New building on any significant scale will merely lead to an exponential growth in housing formation which future local plans would only be able to accommodate by surrendering more and more landscape until the area is entirely developed.</p> <p>The character of the area is already being eroded, the atmosphere increasingly polluted with traffic, noise,</p>

	<p>fumes and litter. The existing hospital provision is already inadequate and nothing that is here proposed can rectify that. Here in Tring we are fortunate in being close to Stoke Mandeville Hospital but the numbers of houses being built or proposed in Aylesbury Vale will further limit its capacity. Our secondary school is already one of the largest in Hertfordshire and is full to capacity. Our railway station is grossly inadequate in terms of facilities. Our one remaining bank is set to close next year.</p> <p>In my opinion, having only recently completed a District Plan, there should be no need for the Borough Council to have to revise its carefully considered housing numbers upwards so soon. I am sanguine that such an attitude won't wash with the Government and can only urge that the lowest possible figure be worked to.</p> <p>The plan would entail substantial incursion into Green Belt land. In my view, if you can't deliver the housing without using Green Belt land, that simply means that you can't deliver the housing, full stop. I am at a loss to understand how, if some Green Belt land were to be developed and its boundaries were redrawn, the designation could then be considered to have any meaning whatsoever. It was stressed several years ago by John Selwyn Gummer that Green Belt was to be considered permanent. If it is continuously eroded in this way, there will be none left; all its purposes will have been negated and the exercise will have failed. Settlements will have coalesced into each other and the characteristics of each settlement will have been lost.</p>
Include files	
Number	Question 33
ID	LP108383
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</p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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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 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
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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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

	<p>immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO8399
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an
Include files	
Number	Question 33
ID	LP108414
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</i></p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO8428
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO8458
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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

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Include files	
Number	Question 33
ID	LPIO8477
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</i></p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO8482
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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

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Include files	
Number	Question 33
ID	LPIO8495
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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO8500
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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,

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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 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
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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The

	<p>Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO8676
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- All too high.</p> <p>2- Must be limited by categoric refusal to consider development in the Green Belt.</p> <p>3- Must also be limited by infrastructure requirements (cf responses to Q32).</p> <p>4- Option 3 should be eliminated. The enormous negative impact is referred to in the Sustainability Appraisal Working Note, and the fatal consequences for soils and water and landscape are too much to contemplate. cf. Table 2: Summary of Assessment of Growth Options in SAWN.</p>
Include files	
Number	Question 33
ID	LPIO8701
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 33
ID	LPIO8881
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	Q33- NO There is an inadequate assessment of capacity, infrastructure constraints and consequences
Include files	
Number	Question 33
ID	LPIO8961
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	Capacity and infrastructure constraints have not been properly assessed, so the ability to deliver any of the three growth options is unknown
Include files	
Number	Question 33
ID	LPIO9033
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 There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences

	and ability to deliver any of the three growth options considered.
Include files	
Number	Question 33
ID	LPIO9040
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	<p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</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 33
ID	LPIO9162
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>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 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.
Include files	
Number	Question 33
ID	LPIO9167
Full Name	S Langley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
Include files	
Number	Question 33
ID	LPIO9355
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</p>

	<p>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 33
ID	LPIO9361
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</p>

	<p>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 33
ID	LPIO9425
Full Name	Mr Gary Poust
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I couldn’t see (possibly missed) the number of existing homes currently in Dacorum with a breakdown by district? In other words what is the proposed percentage increase each district is expected to accept, given the various options available?
Include files	
Number	Question 33
ID	LPIO9539
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	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.

	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.
Include files	
Number	Question 33
ID	LPIO9587
Full Name	Mark Somervail
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>1 Housing</p> <p>I wholly agree with the need for new housing and the scale of the proposal seems reasonable.</p> <p>It just needs to be implemented properly.</p>
Include files	
Number	Question 33
ID	LPIO9778
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>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</i></p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- 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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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 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.
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	<p>authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO9795
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO9826
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • It is not reasonable to set a housing target above numbers achievable considering all the constraints

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Include files	
Number	Question 33
ID	LPIO9939
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 33
ID	LPIO10001
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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- 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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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 33
ID	LPIO10015
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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</i>

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	adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO10049
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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,

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Include files	
Number	Question 33
ID	LPIO10064
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. 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 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO10118
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 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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the

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Include files	
Number	Question 33
ID	LPIO10132
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	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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BRAG response to Question 33 (please note full document is attached to Q46)

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Include files	
Number	Question 33
ID	LPIO10166
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>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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO10181
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>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>

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files

Number	Question 33
ID	LPIO10223
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 33 (please note full document is attached to Q46)</p>

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

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	<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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO10237
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	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

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

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO10270
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 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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p>

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Include files	
Number	Question 33
ID	LPIO10286
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

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Include files	
Number	Question 33
ID	LPIO10320
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</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.” 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

- 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
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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the

	plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO10368
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>

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO10369
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

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Include files

Number

Question 33

ID

LP1010434

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 they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options

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Include files	
Number	Question 33
ID	LPIO10449
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	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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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO10483
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 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 33 (please note full document is attached to Q46)</p>

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Include files	
Number	Question 33
ID	LPIO10498
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

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Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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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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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
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Include files	
Number	Question 33
ID	LPIO10533
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</i>

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Include files	
Number	Question 33
ID	LPIO10581
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</i>

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	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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO10628
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</p>

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO10643
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

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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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files

Number	Question 33
ID	LPIO10678
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</i>

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Include files

Number	Question 33
ID	LPIO10726
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 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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old.

	<p>The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO10740
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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
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	<p>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO10760
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	please refer to our response to Question 16. For full response please see question 46.
Include files	
Number	Question 33
ID	LPIO10819
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 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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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
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	<p>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 would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO10820
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p>

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Include files	
Number	Question 33
ID	LPIO10872
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.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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- 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
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Include files	
Number	Question 33
ID	LPIO10887
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p>

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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
- 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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO10920
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	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

	<p> 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 33
ID	LPIO10969
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>

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.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 "*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

	<p>margins of error given the various assumptions on which they are</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO10970
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p>

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO11020
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 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 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 33 (please note full document is attached to Q46)

Do you agree that the three growth levels proposed are the most reasonable to consider?

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO11033
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p><i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options

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Include files	
Number	Question 33
ID	LPIO11067
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</p>

	<p>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 33
ID	LPIO11100
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	Capacity and infrastructure constraints have not been properly assessed, so the ability to deliver any of the three growth options is unknown.
Include files	
Number	Question 33
ID	LPIO11147
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 is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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 "<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 numbers has not progressed at the level previously

	<p>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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO11194
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	No because no proper capacity study has been undertaken.
Include files	

Number	Question 33
ID	LPIO11241
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</p>

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO11243
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

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.

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

- 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
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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files

Number

Question 33

ID	LPIO11291
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 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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the

consequences and ability to deliver any of the three growth 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 33
ID	LPIO11308
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>

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO11379
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 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 33 (please note full document is attached to Q46)</p>

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

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Include files	
Number	Question 33
ID	LPIO11380
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	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.

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files

Number

Question 33

ID	LPIO11428
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 assumptions on which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p>

Do you agree that the three growth levels proposed are the most reasonable to consider?

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Include files	
Number	Question 33
ID	LPIO11429
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	I am writing in response to the current consultation to register my views on the proposals.

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.

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.

NO

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- 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

- 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example

Include files

Number	Question 33
ID	LPIO11456
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 33
ID	LPIO11482
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 33
ID	LPIO11536
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 three growth levels proposed 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 33
ID	LPIO11559
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>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.</p> <p>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.</p>
Include files	
Number	Question 33
ID	LPIO11617
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 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 8 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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
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Include files	
Number	Question 33
ID	LPIO11618
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO11653
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 33
ID	LPIO11705
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 33
ID	LPIO11772
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.</p>

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

Brag Response to question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- 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 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.
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish

	<p>authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO11793
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 Scale of proposed developments in Tring :-t</p> <p>Tring current population (set 2016) is 12206 . The plan proposes an additional 13450 new homes , this equates to a population growth of 40350 in 10 years to a new population of 52556 .</p> <p>This represents a 330% increase and does not include additional building outside the plan (infills gardens etc) which will probably add C 6000 to the above figure</p> <p>Growth of this scale will totally change the nature of the town.</p> <p>Population growth in this area is C5.5% per annum this would amount to 2881 new homes itself substantial but a figure that could probably be absorbed with sensitive planning.</p> <p>However given the current attitude to the need for homes perhaps a higher figure is appropriate but even a growth rate double the current 5.5 % would only result in a further 10400 homes (or 77%of the Councils plans)</p> <p>(I doubt if there are any scenarios where the south east can support an indefinite annual population increase of 11% without consequences politically and possible civil unrest)</p>
Include files	
Number	Question 33
ID	LPIO11813
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	Only Option 1 (602 pa) at this stage, too soon to jump to options 2 and 3
Include files	
Number	Question 33
ID	LPIO11922
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	See Q 16. Lower levels should also be considered.
Include files	
Number	Question 33
ID	LPIO11968
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 33
ID	LPIO12070
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.

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.

Standard BRAG response to Question 33. Please note full document is attached to Question 46

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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- consideration of increased density including taller buildings in appropriate areas would release more
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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 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
 - DBC figures ignore the major extension to East Hemel that is proposed by St Albans.

	<p>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 would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO12084
Full Name	David Wilyman
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 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>Of the options put forward, Option 1B is the only one that would be acceptable for Berkhamsted.</p> <p>Standard BRAG response to Question 40. Please note full document is attached to Question 46</p> <p>Question 40 <i>Is Option 1B your preferred option for delivering the growth needs of the Borough?</i></p> <ul style="list-style-type: none"> • This is the best of the options offered and concentrates the growth on Hemel Hempstead

which as a new town that is far better equipped/ designed to grow as confirmed by the Core Strategy Inspector when referring to “the sustainability credentials” of Hemel. Forcing massive growth on the Market Towns is not acceptable given the infrastructure limitations and would destroy their unique

- 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.

- 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. Rather than being made to feel guilty, residents of Berkhamsted should be proud to help “protect the town’s historic character and setting” and feel proud for the contribution the town has **already** made to the housing needs of Dacorum. Berkhamsted should most definitely not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty
- The Core Strategy Planning Inspector was in full agreement that the focus for development should be on Hemel. This option concentrates development on Hemel and provide best option for new supporting infrastructure.

Standard BRAG response to Question 1. Please note full document is attached to Question 46

Include files	
Number	Question 33
ID	LPIO12109
Full Name	Colin Blundel

Company / Organisation	Chiltern Society
Position	Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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>We consider that the three growth levels considered are appropriate, but the plan could also have considered the lower figure (430/year) from the Core Strategy.</p> <p>As we have stated elsewhere in the response, we do not consider that the proposed option of 1000 – 1100 homes is acceptable due to potential significant incursions into the Green Belt and possibly the AONB and its setting.</p>
Include files	
Number	Question 33
ID	LPIO12163
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</p>

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.

Standard BRAG response to Question 33. Please note full document is attached to Q46.

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish

	<p>authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO12183
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 33
ID	LPIO12191
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>There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences</p>

and ability to deliver any of the three growth options considered.

Standard BRAG response to Question 33. Please note full document is attached to Q46.

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO12225
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

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.

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.

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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Include files	

Number	Question 33
ID	LPIO12239
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>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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO12304
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</p>

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.

Standard BRAG response to Question 33. Please note full document is attached to Question 46.

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old.

	<p>The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO12321
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>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> <p>Standard BRAG response to Question 33. Please note full document is attached to Question 46.</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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>be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO12370
Full Name	Mr Brian Kazer
Company / Organisation	Tring in Transition
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>No. Options 1 and 2 are reasonable to consider.</p> <p>Option 3 is not reasonable because it is based on the fundamentally flawed formula contained in pare 20 of the Govt “Right Homes Right Places”. It is fundamentally flawed regarding planning authorities whose residents commute into London, such as Dacorum. That is because the proposed approach is based on median house prices where people work, ie for the large percentage of Dacorum commuters this means London where house prices are far higher than in Dacorum. The proposed formula would inflate house-building requirements substantially above the number justified by evidence/projected population growth. The formula should instead be based on the median house price in the area where people live.</p>
Include files	
Number	Question 33
ID	LPIO12395

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	Should be based on an assessment of what the infrastructure can accommodate, the constraints of the area and the character we wish to retain. If we want Hemel to extend to Aylesbury growth rate could be enormous but suspect the voters don't.
Include files	
Number	Question 33
ID	LPIO12413
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 33
ID	LPIO12448
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.

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.

Standard BRAG response to Question 33. Please note full document is attached to Question 46.

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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Include files	
Number	Question 33
ID	LPIO12463
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>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> <p>Standard BRAG response to Question 33. Please note full document is attached to Question 46.</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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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Include files	
Number	Question 33
ID	LPIO12496
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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- 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 33
ID	LPIO12543
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 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</p>

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Include files

Number

Question 33

ID	LPIO12558
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>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> <p>Standard BRAG response for Question 33. Please note full document is attached to Question 46.</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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

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Include files	
Number	Question 33
ID	LPIO12559
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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 33
ID	LPIO12589
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the

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Include files	
Number	Question 33
ID	LPIO12593
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>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO12642
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</i></p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO12645
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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.

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Include files	
Number	Question 33
ID	LPIO12691
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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

	<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. • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO12706
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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>"

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	plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO12739
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 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>

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Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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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

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Include files	
Number	Question 33
ID	LPIO12751
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	Here are my comments on the new Local Plan

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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Include files

Number

Question 33

ID	LPIO12788
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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</i>

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	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO12835
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 to quite large margins of error given the various</p>

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Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO12850
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

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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

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Include files

Number

Question 33

ID	LPIO12883
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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</i>

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	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO12907
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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,

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Include files	
Number	Question 33
ID	LPIO12937
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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO12986
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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

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Include files	
Number	Question 33
ID	LPIO13001
Full Name	Edward Keane
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 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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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Include files	
Number	Question 33
ID	LPIO13035
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 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 33 below (full BRAG response see question 46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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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Include files	
Number	Question 33
ID	LPIO13049
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>

BRAG response to question 33 below (full BRAG response see question 46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO13088
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

I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.

...

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- 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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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 33
ID	LPIO13136
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 which they are calculated. DBC have not considered the rejected options properly.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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 33
ID	LPIO13151
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>

BRAG response to Question 33 (please note full document is attached to Q46)

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Include files	
Number	Question 33
ID	LPIO13171
Full Name	Mr J P Goodings
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 33
ID	LPIO13194
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	They are far too high. Kings Langley has no room.
Include files	
Number	Question 33
ID	LPIO13261
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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

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	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13266
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.

	<ul style="list-style-type: none"> Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13412
Full Name	Mr Alan Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The draft government figure is only one you should be working towards with Brexit who knows what impact that will have on immigration
Include files	
Number	Question 33
ID	LPIO13413
Full Name	Mrs Christine Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	The draft government figure is only one you should be working towards with Brexit who knows what impact that will have on immigration
Include files	
Number	Question 33
ID	LPIO13470

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>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> <p>A 40% increase seems high – the uncapped figure untenable.</p> <p>The current local projection is significantly above the current core strategy – it seems to have changed a lot in a short space of time.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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

- 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The Government consultation categorically does NOT

	<p>indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO13518
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 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</p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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
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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO13533
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</i>

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

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	adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13573
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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

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Include files	
Number	Question 33
ID	LPIO13591
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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>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"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13626
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>

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

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

- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO13641
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

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.

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files

Number

Question 33

ID	LPIO13688
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p>

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

	<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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13703
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.

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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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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
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- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO13753
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 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:</p> <p>A realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints</p> <p>A realistic assessment of the allocation of development.</p> <p>The recognition that predictions of need are subject to quite large margins of error because of the various assumptions on which they are calculated.</p> <p>I do not believe that DBC have considered the rejected options properly.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p>

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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	<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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13768
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>

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

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO13779
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</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.” 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

- 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the

	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13804
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 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 33 (please note full document is attached to Q46)</p>

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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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- 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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13859
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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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	<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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO13874
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:-

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO13948
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 33
ID	LPIO13989
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
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 33
ID	LPIO14028
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.

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- 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 33
ID	LPIO14077
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	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.

Question 33.

DBC document: Section 10.1, Issue 25. *What levels of housing growth should we consider?*

This section of DBC's document refers to the latest Government proposals contained in DCLG consultation proposals: *Planning for the right houses in the right places*. A simple formula is proposed by DCLG to derive an Adjustment Factor for each local authority based on an Affordability Ratio. DCLG state quite clearly in paras 13(c) and 24(b) that the formula is intended to correct imbalances in supply and demand by building more houses in areas high Affordability Ratio (i.e. low affordability) and fewer houses in areas where houses are more affordable.

Affordability Ratios (ONS data) for England show the majority of council areas fall into the range of 4 to 20, Dacorum being 11.2 and neighbouring St.Albans 16.8. These figures give rise to Adjustment Factors of 0.45 for Dacorum and 0.80 for St. Albans, meaning that these councils will have to build an additional 45% and 80% respectively more houses over and above the number needed to meet their area's projected household growth.

However an "across the board" cap is proposed of 40%, corresponding to an Affordability Ratio of 10.4. Consequently those areas with Affordability Ratios in excess of 10.4 (i.e. most of London and south-eastern England) will not be subject to a full attempt to match supply and demand but will merely be subjected to an arbitrary 40% increment over projected need regardless of the demand as determined by the area's Affordability Ratio. For example, instead of building 80% more houses, St. Albans will only be required to build an additional 40%. Thus the DCLG formula will only apply as intended to those areas with an Affordability Ratio below 10.4. Because the 40% cap applies predominantly to areas of low affordability, areas of better affordability will carry an additional relative housebuilding burden in order that, in aggregate, the Government's national housebuilding target is met. The DCLG's formula will therefore do the opposite of what is intended; it will put too few houses in areas of high demand with the shortfall being taken up by too many in the areas of low demand.

To correct the above anomaly a cap could be applied to the whole of the 4-20 range of Affordability Ratios and varied pro rata with the

ratio down to 0% at Affordability Ratio of 4. For example if the cap was 50% at Affordability Ratio of 20, Adjustment Factors would become 0.28 for Dacorum and 0.42 for St. Albans, i.e. in the same ratio as the two areas' affordabilities, and therefore more equitable in accordance with the aims of the DCLG's proposals. DBC's housing numbers in Options 1a,1b and 1c would in this way reduce from 602 to 550 and from 1100 to 968 in Options 2a, 2b and 2c. The percentage cap would need to be calculated to deliver the Government's target; the above figures are for illustrative purposes only. However, under the circumstances described above it is surely perverse to be considering in great detail the Issues and Options open to Dacorum to meet their revised need for housing based on such a patently dysfunctional formula as the one currently proposed.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- 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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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 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.
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO14125
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 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</p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 "*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.
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO14140
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 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>

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.

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	plan should be left the last date but simply offer it as an example.
Include files	

Number	Question 33
ID	LPIO14176
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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</i>

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	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO14319
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 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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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

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Include files	
Number	Question 33
ID	LPIO14320
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>he 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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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</i>

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Include files

Number	Question 33
ID	LPIO14323
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	
Include files	
Number	Question 33
ID	LPIO14405
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 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</p>

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Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the

	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO14420
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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

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Include files	
Number	Question 33
ID	LPIO14454
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO14503
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</i></p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO14519
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>There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and</i></p> <p><i>ability to deliver any of the three growth options considered.</i></p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 33
ID	LPIO14780
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 –</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
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	adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO14799
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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

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- 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

	<p>would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO14812
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	CPRE cannot support a growth figure above that which can be accommodated within the boundaries of towns and villages within the Green Belt, unless exceptional circumstances exist to support release of Green Belt land.
Include files	
Number	Question 33
ID	LPIO14847
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 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.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO14852
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p>

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Include files	
Number	Question 33
ID	LPIO14898
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	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 realistic assessment of the potential contribution each settlement can make.]

Include files

Number

Question 33

ID	LPIO14954
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 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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p>

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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Include files	
Number	Question 33
ID	LPIO14955
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.

There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. **The pumping facilities for water supply along the South Berkhamsted Ridge are already under pressure with the supply aquifer reaching critically low levels in recent years.**

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

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Include files	
Number	Question 33
ID	LPIO15005
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>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 33 (please note full document is attached to Q46)</p>

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- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options
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- 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
- 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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15020
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.

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO15053
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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 "*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

	<p>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</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15068
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>

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth 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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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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO15115
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"> • Paragraphs 10.0.1 to 10.1.10 of the consultation documents explain the options that the Council is considering in terms of the levels of housing growth that Local Plan will provide for. In doing so, three options are identified and described by the Council at paragraph 10.1.8, as follows: <ul style="list-style-type: none"> • Option 1: Draft Government figure (602 homes per annum); • Option 2: Locally Assessed need (about 756 homes per annum); • Option 3: Upper Government figure (about 1,100 homes per annum); • Firstly, Option 3 would be more accurately described as the 'Standardised Methodology Figure' and this should be changed accordingly. The standardised methodology consultation is set out within the recent 'planning for the right homes in the right places' Government consultation, in which the Government proposes to introduce a standardised methodology for the calculation of housing needs. In applying the standardised methodology, the Government proposes that housing growth levels should be 'capped' at no more than 40% above the amount of development planned for in the current Development Plan. In the case of Dacorum, the 'capped' requirement would be 602 homes per annum, which is the Option 1 in the Dacorum consultation document. • However, if applying the standardised methodology without applying a 'cap', the Council calculates that the annual housing requirement for Dacorum would be about 1,100 homes per year. This is the Option 3 figure in the consultation document. • The consultation document also puts forward another optional figure, under Option 2, which is 756 homes per year. This figure of 756 homes is the same as that which is identified in the South West Hertfordshire SHMA. The SHMA figure is therefore the one that is currently supported by the existing evidence base in accordance with the NPPF, paragraph 159, which requires local planning authorities to prepare a SHMA to assess their full housing needs, working with neighbouring authorities. • Option 2 must however be considered as a minimum requirement given the uncapped projection shown in in option 3, which indicates a much higher level of need than that in Option 2. Furthermore, the Council should continue to monitor the Government's emerging guidance on this matter in the form of the standard methodology, which is due to be confirmed by the end of March 2018.
Include files	
Number	Question 33

ID	LPIO15181
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>Option 3 [Upper Government figure] should not be included. It is clearly undeliverable – both in terms of homes and infrastructure, not to mention funding. The inclusion of Option 3 is justified on the grounds that the need figure may increase significantly above its current level. If such an unlikely need does arise at some future time then it can be reviewed at that stage and quickly rejected.</p>
Include files	
Number	Question 33
ID	LPIO15201
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>Option 3 [Upper Government figure] should not be included. It is clearly undeliverable – both in terms of homes and infrastructure, not to mention funding. The inclusion of Option 3 is justified on the grounds that the need figure may increase significantly above its current level. If such an unlikely need does arise at some future time then it can be reviewed at that stage and quickly rejected.</p>
Include files	
Number	Question 33
ID	LPIO15220
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>The South West Herts Housing Market Area covers the whole local authority areas of Dacorum, Hertsmere, St Albans, Three Rivers and Watford. Nevertheless, there are strong housing market relationships between parts of the South West Herts Housing Market Area and Welwyn Hatfield and as a result, certain areas also fall within the defined Welwyn Hatfield Housing Market Area.</p> <p>The Welwyn Hatfield Local Plan examination is ongoing but the Planning Inspector has already indicated that it is the defined Welwyn Hatfield Housing Market Area, which he considers is the appropriate basis for considering the full OAHN and the degree to which the need for housing is being met within the defined WH HMA.</p> <p>We note the reference in your consultation document to the housing shortfall in Welwyn Hatfield and request that in line with the Duty to Cooperate, dialogue between Welwyn Hatfield and the South-West Hertfordshire authorities (including Dacorum Borough Council) continues to take place, on matters to do with housing land supply and the full OAHN.</p> <p>Welwyn Hatfield would also reiterate the matters raised, and the previous request made, in our letter to you on 3 August 2017. Welwyn Hatfield has agreed Memoranda of Understanding with a number of authorities, including Hertsmere, to explore where opportunities may exist to accommodate any of Welwyn Hatfield's shortfall against its OAN, (both within and beyond the plan period). However, at the current time, no other authority within the Welwyn Hatfield HMA has indicated that they can assist us with the identified shortfall in Welwyn Hatfield.</p> <p>Accordingly, and in response to your request for early notice, Welwyn Hatfield continues to request that Dacorum Borough Council considers if it is able to assist Welwyn Hatfield with meeting some of our housing shortfall as part of its plan preparation (within the context of the SW Herts HMA).</p> <p>With regards to the full OAHN for Dacorum and what is the appropriate figure, this will depend upon at what point the NPPF is updated and the approach taken to the standard methodology. If Dacorum considers it would be appropriate to use a figure derived from a SHMA, then this would need to be updated to reflect the latest population and household projections and should consider whether a higher uplift for market signals including any signs of worsening affordability would be more consistent with current practice (with reference to recent examination decisions).</p>
Include files	
Number	Question 33
ID	LPIO15281
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 33 (please note full document is attached to Q46)</p> <p>Question 33: <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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 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.
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15332
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>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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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

	<p>increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO15346
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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

	<p>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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example
Include files	
Number	Question 33
ID	LPIO15381
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></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
- 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

	<p>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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15402
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	1 In the context of a Government imposed range of targets, since there is little evidence that the population growth projections are anything other than arbitrary then the right level to project would

	be the lowest figure possible. In this case that equates to 13,800 (which is already 40% higher than the current Core Strategy). There is no case for projecting a higher figure (ie DBC proposal for 17,400).
Include files	
Number	Question 33
ID	LPIO15443
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>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</p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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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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
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- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO15458
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 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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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>

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Include files	
Number	Question 33
ID	LPIO15491
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> <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,</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

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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 capacity
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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 33
ID	LPIO15503
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>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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish

	<p>authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO15547
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.

	<ul style="list-style-type: none"> Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15596
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered 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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	<p>margins of error given the various assumptions on which they are calculated</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15663
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the

consequences and ability to deliver any of the three growth options considered

- 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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	<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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15722
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 33, full document attached to question 46</p>

	We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.
Include files	
Number	Question 33
ID	LPIO15770
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO15817
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>Capacity and infrastructure constraints have not been properly assessed, so the ability to deliver any of the three growth options is unknown.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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</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.” 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the

	plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO15833
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p>
Include files	

Number	Question 33
ID	LPIO15875
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"> Of the three development options, it is considered that the starting point for considering growth options is the 756 dwellings per annum, as based on the outputs of the SHMA. In terms of Option 1, responses to other questions have already raised concerns about the validity of that figure as a basis for further consideration.
Include files	
Number	Question 33
ID	LPIO15894
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</p>

	<p>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 33
ID	LPIO15925
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>We do not consider that the first option, which relates to a housing target of 602 homes per annum, is a reasonable option, for two reasons:</p> <p>(1) Although it is referred to as the "Draft Government Figure", it is only applicable because the current Core Strategy is less than 5 years old, but as noted in our response to Question 16, this ignores (a) the fact that the Core Strategy will be over 5 years old before the Council can submit its new Local Plan, and hence this figure will 'fall away' anyway, and (b) it ignores the fact that the adopted Core Strategy was an interim plan anyway, because it failed to make appropriate provision for housing;</p> <ul style="list-style-type: none"> The figure is less than the Council's OAN, and since no evidence has been advanced to suggest that the OAN is not achievable, use of a lower figure, even if it does arise from the standard methodology, would be inappropriate.
Include files	
Number	Question 33
ID	LPIO15984

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	At the Regulation 18 stage it is appropriate to seek the views of the community on a range of reasonable options for housing growth. In this case, the three options encompass the upper and lower outcomes from the Government's draft Housing Needs Methodology plus the figure arising from the SW Herts SHMA. Options below 600 homes per year or above 1,100 homes per year would not be reasonable.
Include files	
Number	Question 33
ID	LPIO16020
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel</p>

	<p>Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16033
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p>

	<p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LP1016075
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate</p>
Include files	
Number	Question 33
ID	LP1016089
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16129
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO16147
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of</p>

	<p>either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16188
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>

Include files	
Number	Question 33
ID	LPIO16204
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	

Number	Question 33
ID	LPIO16245
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO16266
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a</p>

	<p>Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16306
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33

ID	LPIO16326
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16368
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO16415
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 –</i></p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO16416
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 33. 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> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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

	<p>would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	

Number	Question 33
ID	LPIO16440
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>

Include files	
Number	Question 33
ID	LPIO16481
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>In particular, I believe:-</p> <ol style="list-style-type: none"> 1 Dacorum Borough Council needs to make a strong case in support of a lower target figure for homes, following government requirements to protect the Green Belt. Since almost all non-urban areas of Dacorum are Green Belt, this constraint makes such a position highly justifiable. 2 I believe the target figure should be at most the Government draft figure of 602 homes per year. The current target of 430 homes per year is more sustainable. <p>GFRA Response to Question 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO16501
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

I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.

- 1 Dacorum Borough Council needs to make a strong case in support of a lower target figure for homes, following government requirements to protect the Green Belt. Since almost all non-urban areas of Dacorum are Green Belt, this constraint makes such a position highly justifiable.
- 2 I believe the target figure should be at most the Government draft figure of 602 homes per year. The current target of 430 homes per year is more sustainable.

CCG response to question 33 full document attached to question 46

.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 33
ID	LPIO16557
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 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</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> <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>. 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</i></p>

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.

. 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 would bring the numbers up to or very close to the ‘draft Government figure’.

. Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LP1016692

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 33
ID	LPIO16724
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 33
ID	LPIO16731
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	The Council should choose the highest level of growth for Dacorum, to seek to address the pressing need for new homes that exists in the Borough
Include files	
Number	Question 33
ID	LPIO16747
Full Name	Martin Ephgrave
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 is usual for council's to seek views on three options for growth, one option should meet objectively assessed needs in full, and the two other options should explore the provision of housing growth that is below and above objectively assessed needs.</p> <p>The initial draft of the consultation document, which was on the agenda for the Council's Cabinet Committee on 19 September 2017, followed this approach, and suggested three growth options - Option 1 was below housing need (600 homes), Option 2 met housing need in full (756 homes) and Option 3 was for a higher level of growth which exceeded housing need (907 homes).</p> <p>The initial draft consultation document was not reported to Cabinet, due to the government consulting on a new proposed method of calculating housing need. A revised Issues and Options document was then prepared and issued for formal consultation in November 2017 (the current consultation).</p> <p>However, the current issues and options consultation document no longer follows the approach of the draft document, as all three options for growth are <u>below</u> the proposed new government figure of 1100 homes. It no longer tests an 'above housing needs' scenario.</p> <p>We would usually ask that a higher level of growth is tested, but in the circumstances, given the significant increase from the adopted Core Strategy of 430 homes per year, and the current government figure of 1100 homes per year, we support the council's approach. We do not consider that it would be useful to test a level of growth that exceeds the new proposed governments figure.</p>
Include files	
Number	Question 33
ID	LPIO16800
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16840
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO16868
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing</p>

	<p>supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LP1016908
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LP1016956
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO16996
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17013
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been</p>

	<p>robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17053
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17070
Full Name	Grahame Senior
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 support and endorse the views expressed in the attached document as a member of GFRA</p> <p>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council’s Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough’s existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 33</p>
<p>ID</p>	<p>LPIO17110</p>
<p>Full Name</p>	<p>Grahame Senior</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>I support and endorse the views expressed in the attached document as a member of GFRA</p>

	<p>GFRA Response to Question 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LP1017244
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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

	<p>margins of error given the various assumptions on which they are calculated</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 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO17245
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>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.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The Government consultation categorically does NOT

	<p>indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO17301
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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

	<p>would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO17317
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council’s Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly</p>

	<p>identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17357
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17409
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 33 below (copy of full response attached to question 46)</p> <p>Question 33</p> <p><i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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 33
ID	LPIO17424
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17464
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17483
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel</p>

	<p>Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17523
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17571
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 33 below (copy of full response attached to question 46)</p> <p>Question 33</p> <p><i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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 33

ID	LPIO17590
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33

ID	LPIO17630
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17660
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	only one growth level should be considered – c. 1,000 a year
Include files	
Number	Question 33
ID	LPIO17664
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17704
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17753
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 33 below - full document attached to Question 46</p> <p><i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) 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 <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%

	<p>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. • 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 33
ID	LPIO17769
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty</p>

	<p>land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17809
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>Dacorum Council should try to resist increasing the planned housing in the borough beyond the currently proposed 602 additional houses per year</p> <p>GFRA Response to Question 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>

Include files	
Number	Question 33
ID	LPIO17827
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>Dacorum Council should try to resist increasing the planned housing in the borough beyond the currently proposed 602 additional houses per year</p> <p>Summary Section from GFRA – Executive summary</p> <p>This report has been prepared on behalf of Grove Fields Residents Association (GFRA) to provide a response to the questions raised within the Issues and Options Consultation Local Plan to 2036 Paper, on behalf of Members of the Association. As of the 11th December 2017, the GFRA represents 325 members.</p> <p>The Association consists of a significant collection of individuals who are collectively concerned with both the approach to proposed housing allocation numbers, specification and location within the Borough as a whole and more specifically within the market town of Tring. Further to this the Association specifically looks to defend the land located between Bulbourne Road and Station Road (which makes up allocation reference sites TR-H1, TR-H2 and TR-H3) to the immediate east of Tring and within highly valued Green Belt designated land.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17867
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</p>

	<p>conclusions of the planning consultants commissioned by the Association (attached).</p> <p>Dacorum Council should try to resist increasing the planned housing in the borough beyond the currently proposed 602 additional houses per year</p> <p>GFRA Response to Question 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17885
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the</p>

	<p>requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO17925
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO17994
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 DOCUMEMNT) , my own views can be summarised in a handful of bullet point.</p> <p>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LP1018034
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO18065
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of</p>

	<p>either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO18105
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33

ID	LPIO18122
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO18162
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO18179
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel</p>

	<p>Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO18219
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO18272
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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</i>

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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO18273
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>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>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO18292
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO18332
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO18349
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>The Council should choose the highest level of growth for Dacorum, to seek to address the pressing need for new homes that exists in the Borough</p> <ul style="list-style-type: none"> The proposed housing site to the south east of Mini Dealership, London Road, is considered to

be one of the more sustainable locations within the 'Rest of the Borough'. It is on the edge of the existing built up area, adjacent to a village pub, a local shop and employment opportunities, is well served by bus routes and also offers the ability to cycle safely along the tow path. It is also much close to the larger settlements of Berkhamsted and Tring than other settlements in the rural area.

The site has a capacity to provide a mixed used development of up to 28 new homes, in an attractive design sympathetic to its canal side setting incorporating canal boat moorings at a more sustainable location within the Rural Area compared to other smaller settlement, and would provide a significant contribution to local housing need.

It is usual for council's to seek views on three options for growth, one option should meet objectively assessed needs in full, and the two other options should explore the provision of housing growth that is below and above objectively assessed needs.

The initial draft of the consultation document, which was on the agenda for the Council's Cabinet Committee on 19 September 2017, followed this approach, and suggested three growth options - Option 1 was below housing need (600 homes), Option 2 met housing need in full (756 homes) and Option 3 was for a higher level of growth which exceeded housing need (907 homes).

The initial draft consultation document was not reported to Cabinet, due to the government consulting on a new proposed method of calculating housing need. A revised Issues and Options document was then prepared and issued for formal consultation in November 2017 (the current consultation).

However, the current issues and options consultation document no longer follows the approach of the draft document, as all three options for growth are below the proposed new government figure of 1100 homes. It no longer tests an 'above housing needs' scenario.

We would usually ask that a higher level of growth is tested, but in the circumstances, given the significant increase from the adopted Core Strategy of 430 homes per year, and the current government figure of 1100 homes per year, we support the council's approach. We do not consider that it would be useful to test a level of growth that exceeds the new proposed governments figure.

Include files	
Number	Question 33
ID	LPIO18465
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	Option 1. as this is based upon Gov. draft need and is the option least likely to have a major impact on both the Greenbelt and conservation areas across the borough.
Include files	
Number	Question 33
ID	LPIO18500
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 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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 "<i>Local planning authorities then need to determine whether there are any environmental designations</i>

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 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.
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO18547
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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 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
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- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed

	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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO18593
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The

	<p>Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO18639
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 that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (Below) <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

	<p>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.</p>
Include files	
Number	Question 33
ID	LPIO18686
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>Also</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</p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
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Number	Question 33
ID	LPIO18732
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>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.</p> <p>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences</p>

and ability to deliver any of the three growth options considered.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

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

	<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 • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO18778
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 that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (Below) <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 33
ID	LPIO18825
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

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.

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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 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
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Include files	
Number	Question 33
ID	LPIO18827
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>

...

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

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?

No

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

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Include files	
Number	Question 33
ID	LPIO18841
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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>

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Include files	
Number	Question 33
ID	LPIO18874
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 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</p>

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BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

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Include files

Number

Question 33

ID

LPIO18920

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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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>

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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO18945
Full Name	Rupert Symmons
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 the urban capacity option should also be considered – development of the greenbelt will result in irreversible harm.
Include files	
Number	Question 33
ID	LPIO18958
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing</p>

	<p>supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LP1018998
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LP1019061
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>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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. • 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 33
ID	LPIO19078
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 too excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO19118
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 too excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19136
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of</p>

	<p>either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO19176
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the</p>

	approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.
Include files	
Number	Question 33
ID	LPIO19194
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's</p>

	existing brownfield sites to make up the predominant shortfall of allocation land for housing supply. GFRA full document attached to question 46
Include files	
Number	Question 33
ID	LPIO19234
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19251
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>

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.

Summary Section from GFRA – Executive summary

The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.

Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.

If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.

GFRA full document attached to question 46

Include files	
Number	Question 33
ID	LPIO19291
Full Name	Marcus, Jane, Abigail and Jennifer Fox
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>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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 33</p>
<p>ID</p>	<p>LPIO19309</p>
<p>Full Name</p>	<p>Richard House</p>
<p>Company / Organisation</p>	<p>Gladman Development Limited</p>
<p>Position</p>	<p>Policy Planner</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>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 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 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 33
ID	LPIO19345
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</p>

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The

	<p>Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO19359
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>Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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

	<ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example. <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>
Include files	
Number	Question 33
ID	LPIO19394
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 Q33. There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.</p>

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO19395
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

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 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans.

	<p>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 would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO19441
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 33</p> <p><i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> See Q 16 (copy below) <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. • 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 33
ID	LPIO19456
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a</p>

	<p>Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO19496
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33

ID	LPIO19513
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO19553
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19570
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited</p>

	<p>predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO19611
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>

Include files	
Number	Question 33
ID	LPIO19627
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>Q33 – Tick NO</p> <p>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p>

	GFRA full document attached to question 46
Include files	
Number	Question 33
ID	LPIO19667
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19687
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>Q33 – Tick NO</p>

Summary Section from GFRA – Executive summary

The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.

Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.

If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.

GFRA full document attached to question 46

Include files	
Number	Question 33
ID	LPIO19726
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	I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment. Further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary

	<p>in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need</p> <p>GFRA Response to Question 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19780
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 33</p> <p><i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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

	<p>at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.</p> <ul style="list-style-type: none"> 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 33
ID	LPIO19809
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release</p>

	<p>Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO19849
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19893
Full Name	Chris Smith
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 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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council’s Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough’s existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 33</p>
<p>ID</p>	<p>LPIO19933</p>
<p>Full Name</p>	<p>Chris Smith</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	<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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO19990
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO20007
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO20047
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO20064
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel</p>

	<p>Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO20104
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	

Number	Question 33
ID	LPIO20121
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. 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>Summary Section from GFRA – Executive summary The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33

ID	LPIO20162
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO20179
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</p>

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.

Thank you

Summary Section from GFRA – Executive summary

The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.

Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.

If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.

GFRA full document attached to question 46

Include files	
Number	Question 33
ID	LPIO20219
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	To whom it may concern,

	<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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO20267
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered

- 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

	<p>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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO20282
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	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.

Please accept this email and the attached report as my feedback on the proposed development of Tring.

Summary Section from GFRA – Executive summary

The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.

Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.

If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.

GFRA full document attached to question 46

Include files	
Number	Question 33
ID	LPIO20322
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO20340
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed</p>

	<p>on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO20380
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment</p>

	however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.
Include files	
Number	Question 33
ID	LPIO20428
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The Government consultation categorically does NOT

	<p>indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO20448
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly</p>

	<p>identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO20489
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	

Number	Question 33
ID	LPIO20537
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.

- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Berkhamsted Citizens response

Do you agree that the three growth levels proposed are the most reasonable to consider?

No

- See Q 16 (copy below)

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 33
ID	LPIO20584
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 that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16(copy below) <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 33
ID	LPIO20616
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>

Include files	
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Number	Question 33
ID	LPIO20656
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO20672
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the</p>

	<p>parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO20712
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB</p>

	limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.
Include files	
Number	Question 33
ID	LPIO20760
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>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>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.</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</p>

	<p>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>
Include files	
Number	Question 33
ID	LPIO20808
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 Lower options should be considered due to infrastructure limitations.
Include files	
Number	Question 33
ID	LPIO20854
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	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.

BRAG response to Question 33 (please note full document is attached to Q46)

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered
- 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.
- Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

Include files	
Number	Question 33
ID	LPIO20873
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 key matters. Please refer to the CCG submission for my full response.</p> <p>4. I find the figures for growth given for Options 2 and 3 to be over-ambitious and premature in terms of Government requirements.</p> <p>Chiltern Conservation Group response 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 '<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 33
ID	LPIO20930
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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</i>

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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO20985
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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

	<p>increased density numbers in appropriate areas would bring the numbers up to or very close to the 'draft Government figure'.</p> <ul style="list-style-type: none"> • Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example. <p>Berkhamsted Town Council response</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>See Q 16. Lower levels should also be considered.</p>
Include files	
Number	Question 33
ID	LPIO21030
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council’s Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty</p>

	<p>land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO21070
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 2; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO21095
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council's Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO21135
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgefield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.</p>
Include files	
Number	Question 33
ID	LPIO21166
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"> Please see response to Question 16. SADBF consider 756 homes per annum to be a suitable starting point for housing need. However, it is more than likely that the housing target will significantly increase through the introduction of the Standard Methodology and DBC should ensure there is sufficient flexibility within the Plan to respond to this
Include files	
Number	Question 33
ID	LPIO21211
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 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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 I am in agreement with BRAG and 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 – this is mentioned but not adequately considered . • 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 I attended 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>” Together with BRAG, I have 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 and I entirely concur with that.
- 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 you will be aware of BRAG's argument that the SHMA has not accounted for that. BRAG gives an example that, 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.
 - 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 would bring the numbers up to or very close to the 'draft Government figure'.
 - Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. (For the sake of clarity, I am not suggesting adoption of the plan should be left the last date but simply offer it as an example.)

Include files	
Number	Question 33
ID	LPIO21259
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>In an area which is covered by important designations, like the Chilterns AONB, the process of establishing a housing figure in a local plan is supposed to involve OAN plus a process of considering constraints, which may well lower the appropriate amount of growth. The Council has failed to carry out that process and is simply accepting pure OAN, unmoderated by constraints. This does not match the Issues and Options document's own cog diagram on page 45, and it does not comply with the NPPF which explains at para 14 that Local Plans should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and unless specific policies in the Framework indicate development should be restricted. Examples of areas where development should be restricted are listed in footnote 9 of the NPPF. They are abundant in Dacorum BC, where there are Special Areas of Conservation, many sites designated as Sites of Special Scientific Interest, significant areas of land designated as Green Belt and Area of Outstanding Natural Beauty, designated heritage assets; and locations at risk of flooding.</p> <p>The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number. The question should not be which alternative OAN figure should the Council adopt, but how much of that growth can be accommodated while delivering sustainable development and protecting features of acknowledged importance like the Chilterns AONB, nationally protected as one of the country's finest landscapes, and with the same level of protection (the highest) as National Parks (NPPF para 115). 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.chilternsconservationboard.org.uk/development/position-statement/</p>
Include files	
Number	Question 33
ID	LPIO21278
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 '<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 33
ID	LPIO21334
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 X (please note full document is attached to Q46)</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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</i>

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 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
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO21380
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 X (please note full document is attached to Q46)</p> <p>BRAG response to Question 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.

	<ul style="list-style-type: none"> Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO21406
Full Name	James Good
Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Question 33: Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p><u>Response:</u> Yes</p> <p><u>Details:</u> APL considers that the three options considered represent the most reasonable options to for the Plan at this stage. Each is based on some form of assessed need.</p> <p>APL has commented separately that it considers that the Council should, as a minimum, plan for at least 756 dwellings per annum to be delivered.</p>
Include files	
Number	Question 33
ID	LPIO21425
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	1.29.1 Please see response to Question 16. The Landowners consider 756 homes per annum to be a suitable starting point for housing need; however, there is a more than likely suggestion that the housing target will significantly increase through the introduction of the Standard Methodology and DBC should ensure there is sufficient flexibility within the plan to respond to this
Include files	
Number	Question 33
ID	LPIO21497
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 33 Do you agree that the three growth levels proposed are the most reasonable to consider? Yes Yes. These levels seem to be the most reasonable to consider as the starting point. However, in order to ensure adequate site identification and delivery the higher numbers are preferred
Include files	
Number	Question 33
ID	LPIO21513
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	Q.33 Growth levels - No 5. Growth levels (introductory text and Section 10) The consultation says 'we have set out what would be the potential impacts of meeting different levels of new homes, but have yet to make a final decision on the matter (Forward)'; 'this .consultation is therefore not about whether Dacorum should grow or not ..(Para 1.0.2) and; 'the main focus of this document is to explore the growth needs in Dacorum and how far these needs should be met (para 3.1.1)'. Growth level Options 1 and 2 appear to have a rationale based mainly on argued lower assessments of <u>need</u> .

	<p>However this definition of the options appears to be mixed with discussion of the policy and the environmental constraints that might justify a lower plan <u>target</u>. The essentially two-step process of identifying 'need' then separately considering factors that might result in a different 'target' appear to have been merged.</p> <p>Also, the relationship to the joint independent Green Belt Review (GBR) process is not clear (albeit it is mentioned). The role of Green Belt restraint in relation to options for greater urban regeneration and development beyond the Green Belt does not appear to have been considered.</p>
Include files	
Number	Question 33
ID	LPIO21560
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 33 (please note full document is attached to Q46)</p> <p>Question 33 <i>Do you agree that the three growth levels proposed are the most reasonable to consider?</i></p> <p>No</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered • 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
- 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 would bring the numbers up to or very close to the 'draft Government figure'.

	<ul style="list-style-type: none"> Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO21578
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>Summary Section from GFRA – Executive summary</p> <p>The report concludes on behalf of the GFRA that the appropriate housing allocation that could be prescribed on an annual basis to the Borough is at present a figure of 602 homes. This takes into consideration a number of critical factors; these include the fact that the Council’s Core Strategy is less than five years old and the delivery of 602 dwellings, meeting the draft calculation currently proposed by Central Government with regard to the parameters appropriate to the Council, is a 40% increase upon the original requirement of 430 dwellings for the Borough. Given the significant physical limitations of a Borough in which the predominant land character is of either Green Belt or Area of Outstanding Natural Beauty land, and where centralised development is limited</p>

	<p>predominantly to the larger settlement of Hemel Hempstead, it is considered that the allocations figure is the appropriate figure at this point in time.</p> <p>Overall therefore it is not considered that the objectively assessed need of the Borough Council has been robustly identified at this point in time given the multiple options available to the Council to calculate required housing supply. Given uncertainty in this regard, it is considered to be unreasonable to over allocate, (whereby the requirements of 756 dwellings per year has not been robustly identified) and the current approach is to release Green Belt land to make up the shortfall, such release should only take place where it has been unequivocally confirmed that it is required to meet the robustly identified housing market requirement.</p> <p>If it is subsequently identified that the annual delivery of 756 dwellings is required, and at this point in time such a conclusion requires further testing, then significant further consideration needs to be given to the options and availability to take advantage of the Borough's existing brownfield sites to make up the predominant shortfall of allocation land for housing supply.</p> <p>GFRA full document attached to question 46</p>
Include files	
Number	Question 33
ID	LPIO21617
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 33, full document attached to question 46</p> <p>We have provided a position on this in relation to Question 16; whereby it is considered that Option 2 in principle provides the correct approach to assessment however it is not considered that the original 728 homes a year calculated in advance of the application of the Sedgfield Test sufficiently considers the restrictions applied to the Borough by way of Green Belt and AONB limitations. As such whilst the GFRA consider that the</p>

	approach in principle is sufficient the actual equation that has been brought forward is not yet accurate.
Include files	
Number	Question 33
ID	LPIO21647
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	Given this underlying uncertainty we consider that it is important for DBC to consider and assess a range of growth levels, to reflect the ongoing evidence base work and wider Government consultations taking into consideration a number of risk factors.
Include files	
Number	Question 33
ID	LPIO21692
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
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"> Please see response to Question 16 (Copy below). CPUK consider 756 homes per annum to be a suitable starting point for housing need; however, there is a more than likely suggestion that the housing target will significantly increase through the introduction of the Standard Methodology and DBC should ensure there is sufficient flexibility within the plan to respond to this. <p>Copy of response to Q 16</p> <ul style="list-style-type: none"> CPUK have reviewed the SHMA documents against the various targets suggested in The Plan. It is acknowledged the DBC presented a range of housing targets within the first draft of The Plan, and then updated this on the publication of the Governments Consultation on the Standard Methodology for Calculating Housing Need. CPUK consider that DBC should focus on their evidence base figure of 756 homes per year, but also have regard to the likely increase in housing need that will likely come forward following adoption of the standard methodology.

	<ul style="list-style-type: none"> • CPOK consider the inclusion of the lower range figure of 602 homes per year to be an emotive matter, used to generate support for a housing target short of meeting full housing needs. Such a decision to fall short of meeting full objectively assessed need should come only after a full review of the capacity within the borough; proceeding with a such a plan would inevitably result in the Examining Inspector finding The Plan unsound; especially where there is no evidence of discussion with neighbouring authorities to agree where the unmet need can be accommodated. • Referencing the lower figure of 602 dwellings per annum as ‘the Government’s draft figure’ is misleading, the standard methodology, applies a maximum 40% cap to any uplift in housing need generated by the standard methodology; as the Core Strategy (adopted September 2013) is currently less than 5 years old, the Core Strategy Target of 430 is used as the starting point; however, post September 2018, the Core Strategy would be more than 5 years old, and the SHMA figure would be used as the base to which the 40% cap would be applied. The lower figure of 602 is simply a quirk of the standard methodology, that would never apply; therefore, this lower figure should be removed from further consideration. • CPOK suggest the SHMA figure of 756 homes per year is an appropriate starting point for use in The Plan at this point. It represents a relatively up to date figure and one that is agreed by most neighbouring authorities (Watford, Hertsmere, Three Rivers). It is however necessary to ensure the final figure is the most up to date figure available • CPOK consider it is necessary for DBC to have in mind the increased figure of up to 1,100 homes per year as generated by the standard methodology. This does provide a clear indication of the Governments thinking to how housing need should be prioritised. SACDC are for example considering the figure of 913 dwellings per annum as per the standard methodology set for consultation in their Issues and Options Plan in January • In summary, CPOK suggest 756 dwellings per annum is an appropriate initial figure, however DBC must be aware, that there will be a more than likely chance of substantial increase to this figure and should seek to identify sites on the assumption of a housing need target above 1,000 homes per annum.
Include files	
Number	Question 33
ID	LPIO21717
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>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> <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</p> <ul style="list-style-type: none"> • There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered

- 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

	<p>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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO21767
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	<p>I have lived in my present house since 1996 and spent some of my childhood in the Borough, living in Berkhamsted from 1965 and attending Ashlyns School from 1966 to 1973.</p> <p>In my view the Consultation document fails to provide adequate justification for the growth rates proposed for the Borough. Dacorum has an up-to-date Local Plan,</p>

and although at the time of the Core Strategy EIP a review was agreed, there was and is no specific timetable for this.

Paragraph 3.3.4 is misleading. The letter written on 7th June 2016 by Brandon Lewis, then Minister of State for Housing and Planning, remains Government policy. The key parts of this letter are as follows:

‘Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. However, we recognise that it is local authorities, working with their communities and with detailed local knowledge, which are best placed to decide the most sustainable, suitable and viable sites for new homes.’

For the avoidance of doubt I have attached a copy of this letter.

The protection of the Green Belt was restated by the Prime Minister on 15th November 2017, when it was reported in the Times that she ‘ruled out building in the Green Belt’. There was no change to Green Belt policy in the autumn 2017 Budget.

Paragraph 3.7.3 refers to various government consultations in progress but none of these has been concluded. In particular without the outcome of the consultation on the right approach to calculating housing need it is difficult to form a judgement on the housing targets in this Consultation.

Paragraph 3.3.4 is also misleading because it fails to recognise that other Local Planning Authorities in England have not planned to meet their housing needs in their Local Plans due to environmental constraints and those Plans have been found to be sound. A recent example is Adur District Council. There is no Green Belt in Adur but the Inspector found that the Council could not meet its full housing need because of the ‘significant constraints that exist’, one of which is the need to preserve the ‘local green gaps’. If this can apply to ‘local green gaps’ it applies even more powerfully to Green Belt which is accorded significantly greater protection under the NPPF. The Inspector also found that there are constraints to development within the wider Housing Market Area which includes Adur, one of which is the existence of the South Downs National Park.

Paragraph 6.1.1 is misleading as there have been no further announcements following the Housing White paper consultation.

Paragraph 6.1.2 is incorrect for the reasons set out above in my comments on Paragraph 3.3.4 citing the example of Adur District Council.

Paragraph 6.1.14 refers to the recent consultation on calculating housing need but there have been no further announcements since the consultation. Some of the proposals in the consultation were widely criticised, as is acknowledged in paragraph 6.1.15.

Question 16 asks which housing figure is most reasonable to use. My view is that the Core Strategy figure is reasonable. Even that figure will result in loss

	<p>of over 80 hectares of Green Belt in the Local Allocations, which I do not agree with for the reasons already set out above relating to Green Belt. In my view the starting premise should be that the Green Belt will be protected with no further losses, in accordance with national policy.</p> <p>Paragraph 10.1.2 is misleading for the reasons already set out above.</p>
Include files	
Number	Question 33
ID	LPIO21813
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>The Sustainability Appraisal identifies a range of health and wellbeing-related issues (air quality, general health and wellbeing, transport, housing etc.) which we fully support.</p> <p>The assessment of these issues against the proposed growth options suggests there will likely be positive and negative effects, of which none are considered to be significant. Whilst we don't disagree with these conclusions, we would ask you to consider our view that at such an early stage in the process it would be remiss for these issues not to be considered further.</p> <p>Undertaking a Health Impact Assessment⁴ of the growth options as part of the Local Plan preparation would address these issues in more detail. As stated above, we would also ask that the Local Plan should set out a policy requirement that all development proposals undertake a Health Impact Assessment at an early stage – and that this should be done in parallel with other required tools used to assess the likely effects of the development when judged against reasonable alternatives.</p> <p>The Sustainability Appraisal identifies a range of health and wellbeing-related issues (air quality, general health and wellbeing, transport, housing etc.) which we fully support.</p> <p>The assessment of these issues against the proposed growth options suggests there will likely be positive and negative effects, of which none are considered to be significant. Whilst we don't disagree with these conclusions, we would ask you to consider our view that at such an early stage in the process it would be remiss for these issues not to be considered further.</p> <p>Undertaking a Health Impact Assessment⁴ of the growth options as part of the Local Plan preparation would address these issues in more detail. As stated above, we would also ask that the Local Plan should set out a</p>

	policy requirement that all development proposals undertake a Health Impact Assessment at an early stage – and that this should be done in parallel with other required tools used to assess the likely effects of the development when judged against reasonable alternatives.
Include files	
Number	Question 33
ID	LPIO21829
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 an absolute minimum OAN of 800 homes per year.
Include files	
Number	Question 33
ID	LPIO21900
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>

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

	<p>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> <ul style="list-style-type: none"> • 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 would bring the numbers up to or very close to the 'draft Government figure'. • Claims that Option 3 will have to be adopted if "the Government's new draft standard formula for assessing need (were) to be applied to Dacorum" is a gross misrepresentation of the facts. 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 immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.
Include files	
Number	Question 33
ID	LPIO21969
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>

	See Q 16. Lower levels should also be considered.
Include files	
Number	Question 33
ID	LPIO21982
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	<p>This section assesses the housing requirement and specifically:</p> <ul style="list-style-type: none"> • Issue 8 – How many new homes need to be provided by 2036? • Issue 25 - What levels of housing growth should we consider? <p>Three housing requirement options are set out, these being:</p> <ul style="list-style-type: none"> • Option 1: Draft Government figure. This would equate to 602 homes a year or 13,846 over the 2013-36 plan-period • Option 2: Locally assessed This would currently equate to about 756 homes a year or 17,388 over the 2013-36 plan-period. • Option 3: Upper Government This would equate to about 1,100 homes a year or 25,300 over the 2013-36 plan-period. <p>Question 33 asks “Do you agree that the three growth levels proposed are the most reasonable to consider?”</p> <p>Paragraph 10.1.8 provides a commentary from the Council’s perspective on each option. Our position is that Option 2 is the most appropriate of the 3 options as that is based on the South West Hertfordshire Strategic Housing Market Assessment (SHMA). Clearly over the next 12 months the Government will publish a new NPPF and methodology for calculating housing need. Therefore the issue of housing need may well be superseded going forward but for the purposes of plan making the conclusion to draw at this early stage is that Option 2 is the minimum requirement that should be advanced.</p>
Include files	
Number	Question 33
ID	LPIO21998
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. In view of the housing demand evidence, we support 'Option 2' being the OAN figure of 756 pa,. Indeed we feel that there is good reason to recommend an even higher number, in excess of 1,000 homes pa, in the light of recent Central Government advice relating to the calculation of the assessment of housing need, where demand is greatest; in locations such as this Borough.
Include files	
Number	Question 33
ID	LPIO22046
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	The following answer response to the three questions 33,34,35. 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.
Include files	
Number	Question 33
ID	LPIO22081
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

We do not consider that the growth levels proposed through Options 1-3 are the most reasonable to consider.

This is for the following reasons:

- Option 1 - 602 homes a year (13,846 homes 2013-2036): This figure equates to the draft figure contained in the Government consultation on 'Planning for the right homes in the right places' September 2017 which considers housing need but also the presence of significant constraints such as those present in Dacorum (Green Belt, AONB and SAC). As such it is therefore broadly supported.

However, we do not agree with the statement set out in paragraph 10.1.8 of I&O which states that it matches the true housing capacity of the Borough. The inclusion of land within existing towns and village boundaries, existing allocations and an allowance for windfalls, plus the identification of previously developed sites with the potential for redevelopment is acceptable. However, as currently set out in I&O, there is still reliance on the release of 'limited Green Belt' land. As we set out above, the Green Belt should be a long-term designation with release through the Local Plan process only in exceptional circumstances. We do not consider that this early review which seeks to roll forward the Plan just 5 years warrants 'exceptional circumstances'.

Further, and without prejudice to our position above, the KL&DRA does not agree with the conclusions of the Green Belt Review which suggests that some land around Kings Langley does not meet all the criteria for continued Green Belt designation. We therefore consider that whilst Option 1 is the preferred option in terms of overall numbers, that it should be fulfilled on the basis of a 'policy on' approach which leaves the Green Belt intact.

Option 2 – 756 homes a year (17,388 homes 2013 – 2036): This figure reflects the level of need assessed through the SHMA. However, on the basis that a new standardised approach to the setting of objectively assessed housing needs is to be brought into play as outlined in Option 1, this approach would appear to be obsolete. Neither does it take account of the significant level of constraints across the Borough which should be considered in adjusting the figure downwards.

Option 3 – 1,100 homes a year (25,300 2013 – 2036): This option anticipates the scenario whereby at the point of adoption, the previous Core Strategy is more than 5 years old. It is recognised that achieving such a high level of growth within the Borough would be extremely hard to achieve.

However, the Local Development Scheme sets out a programme for bringing forward this early Review Plan with an adoption date of June 2018. Such a timetable would ensure that this 'surcharge' of housing numbers would not be applied. It is therefore essential that the momentum on getting the New Single Local Plan in place as quickly as possible is maintained.

	<u>QUESTION 33 Growth levels - Summary Representation and Response Sought:</u> Option 1 is the preferred option in terms of overall numbers, that it should be fulfilled on the basis of a 'policy on' approach which leaves the Green Belt intact.
Include files	
Number	Question 33
ID	LPIO22102
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	Question 33 effectively duplicates Q16 which we have responded to above and should allow for another figure (Option D in Question 16). See Section 2.0 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 for our analysis of the growth levels.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reps (13.12.17).PDF
Number	Question 33
ID	LPIO22147
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 33
ID	LPIO22190
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 33
ID	LPIO22235
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 33
ID	LPIO22429
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 significant reduction 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.

	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> 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. <p>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</p>
Include files	
Number	Question 33
ID	LPIO22459
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>Of the three growth options it is considered that only option 3 will adequately provide for the full objective assessment of housing need in Dacorum.</p> <p>A review of the OAN evidence is presented in the accompanying Turley Local Needs Assessment. This confirms that Option 1 cannot be considered as a credible growth option. It is predicated upon the indicative level of assessed housing need presented by the Government in its recent consultation on a proposed standard method. However, it is acknowledged by the Council as presenting an artificially constrained calculation of need being based upon a cap imposed through the methodology. This 'policy cap' will not be applicable at the point at which the Local Plan will be examined recognising that it is applied on the basis of the adopted Core Strategy which will be more than five years old in 2018.</p>

	The second growth option, whilst introduced as representing the OAN based on the current PPG methodology, is based on datasets which have now been superseded. The concluded OAN falls below the scale of housing need generated on the basis of the most up-to-date 'starting point' demographic projections and cannot therefore be considered a credible growth option. In accordance with the SHMA upon which it is based it is agreed that there is a clear justification for the application of positive upward adjustments to the demographic projection of need to reflect worsening market signals. This suggests the full need for housing will be significantly higher than Option 2 and cannot be viewed as justified in this context.
Include files	
Number	Question 33
ID	LPIO22514
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 is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. • 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 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.
- 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 would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. 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

	<p>immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed 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. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.</p>
Include files	
Number	Question 33
ID	LPIO22564
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 Q 16. Lower levels should also be considered.</p>
Include files	
Number	Question 33
ID	LPIO22585
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	Yes
Your response - Please add your response here	<p>It is usual for Council's to seek views on three options for growth, one option should meet objectively assessed needs in full, and the two other options should explore the provision of housing growth that is above and below objectively assessed needs.</p> <p>The initial draft of the consultation document, which was on the agenda for the Council's Cabinet Committee on 19 September 2017, followed this approach, and suggested three growth options - Option 1 was below housing need (600 homes), Option 2 met housing need</p>

	<p>in full (756 homes) and Option 3 was for a higher level of growth which exceeded housing need (907 homes).</p> <p>The initial draft consultation document was not reported to Cabinet, due to the government consulting on a new proposed method of calculating housing need. A revised Issues and Options document was then prepared and issued for formal consultation in November 2017 (the current consultation).</p> <p>However, the current issues and options consultation document no longer follows the approach of the draft document, as all three options for growth are <u>below</u> the proposed new government figure of 1,100 homes. It no longer tests an 'above housing needs' scenario.</p> <p>We would usually ask that a higher level of growth is tested, but in the circumstances, given the significant increase from the adopted Core Strategy of 430 homes per year, and the current government figure of 1100 homes per year, we support the council's approach. We do not consider that it would be useful to test a level of growth that exceeds the new proposed governments figure.</p>
Include files	
Number	Question 33
ID	LPIO22634
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: See Q 16. Lower levels should also be considered.</p>
Include files	
Number	Question 33
ID	LPIO22651

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 33
ID	LPIO22711
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 33 – Do you agree that the three growth levels proposed are the most reasonable to consider?</p> <p>The consultation document sets out three options:</p> <ul style="list-style-type: none"> • Draft government figure – 602 homes per year or 13,846 (2013–36) • Locally assessed need – 756 homes per year, or 17,388 (2013–36) • Upper Government figure – 1,100 homes a year, or 25,300 (2013–36) <p>We agree that these are reasonable options on levels of growth to consider given the current government policy direction.</p> <p>The options are all substantially above the current Core Strategy annual housing target of 430, and all would require some level of development on greenfield sites.</p> <p>Last year’s COMET model run was based on Core Strategy growth, so we can expect a more challenging outlook from these higher growth options particularly when set alongside growth in surrounding authorities. The scale of growth increases the need to plan new communities well, and secure delivery of the necessary infrastructure improvements at the right time, for both new and existing neighbourhoods.</p>
Include files	
Number	Question 33

ID	LPIO22818
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	<p>The Council's Core Strategy (430 homes/yr) was adopted only 4 years ago after lengthy research and assessment of local needs, paid for by local taxpayers. Option 1 (602 homes/yr) is 40% higher than the Core Strategy. The Council should work to justify its Core Strategy on the basis of existing infrastructure limitations, and the ongoing lack of means to remedy them.</p> <p>The higher figure of Option 1 should be considered as the upper limit for meeting government requirements.</p> <p>We have already seen a rapid growth in new homes built on Dacorum's brownfield sites in recent years. As a direct consequence of those developments, road transport links to M25 and rail links to London are now operating at peak hour capacity, making life in the Borough increasingly unattractive. This in turn would have a negative impact upon forecasts, which may not have been taken into account.</p> <p>No clear reasons are given for considering Option 3.</p>
Include files	

Report Settings Summary

Event	Local Plan Issues & Options November 2017
Total Responses	22,707
Total Respondents	2,376
Filtered Responses	367
Filtered Respondents	357
Questions	<p>Question 34</p> <p>Do you agree with the rejection of the following growth levels:</p> <p>a) Continuing the current housing target (430 homes / year);</p> <p>b) 'Urban Capacity' option (476 homes year); and</p> <p>c) Significantly above the upper Government figure (1,100+ homes / year).</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-34
Pivot	<i>(none)</i>
Document Name	Question 34 - Summary Report
Created on	2019-04-23 09:11:41
Created by	Strategic Planning Admin

Your Opinion

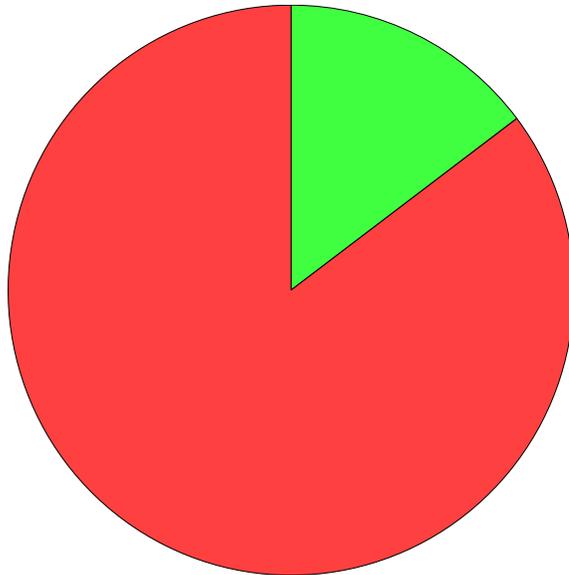
Question responses: **367 (100.00%)**

Question 34

Do you agree with the rejection of the following growth levels:

- a) Continuing the current housing target (430 homes / year);
- b) 'Urban Capacity' option (476 homes year); and
- c) Significantly above the upper Government figure (1,100+ homes / year).

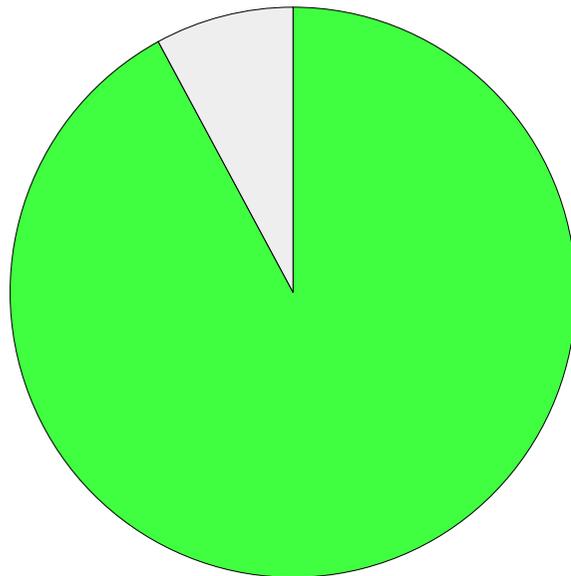
Yes / No



	% Total	% Answer	Count
■ Yes	14.71%	14.71%	54
■ No	85.29%	85.29%	313
Total	100.00%	100.00%	367

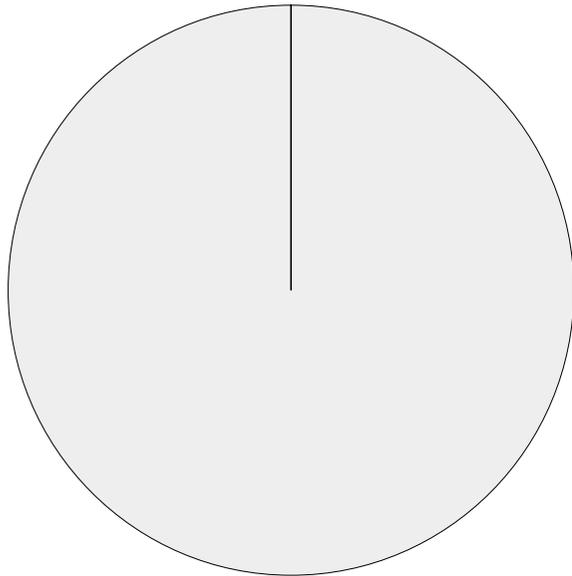
Responses

Question responses: **338 (92.10%)**



	% Total	% Answer	Count
Responses]	92.10%	100.00%	338
No Response	7.90%	--	29
Total	100.00%	100.00%	367

Supporting evidence

Question responses: **0 (0.00%)**

	% Total	% Answer	Count
■ Responses with File(s) Uploaded	0.00%	0%	0
■ Responses with No Uploads	100.00%	--	367
Total	100.00%	0%	367

Issues and Options All Responses to Question 34

Number	Question 34
ID	LPIO23
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 agree these figures should be rejected, however, I think there is a need to be building far higher densities then at present or is proposed in the future.
Include files	
Number	Question 34
ID	LPIO300
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	I don't think they should be rejected. I think you should continue with current levels and refuse to build on green belt land as 2036 is a long way off and we may end up with more homes than needed at the expense of our beautiful countryside
Include files	
Number	Question 34
ID	LPIO301
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	not at all. Growth levels and predictions may change considerably before 2036.
Include files	
Number	Question 34
ID	LPIO351

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 34
ID	LPIO417
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	602 homes per year is the realistic figure at the present time
Include files	
Number	Question 34
ID	LPIO514
Full Name	Mr John Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	602 homes per year is the realistic figure at the present time
Include files	
Number	Question 34
ID	LPIO520
Full Name	Debbi James-Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	602 homes per year is a workable and achievable figure.
Include files	
Number	Question 34
ID	LPIO645
Full Name	Mrs Carole Stokes
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 34
ID	LPIO686
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 On balance option 1 602 homes seems most sensible providing both controlled and achievable growth. I would not support a plan with a number any higher than this.
Include files	
Number	Question 34
ID	LPIO739
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	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

	<p>figures are considerably lower than any of the three options given to us for comment and support the 430 homes/year scenario.</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 34
ID	LPIO778
Full Name	Mr Hemant Patel
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 34
ID	LPIO803
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	Housing should be built on a needs basis. No one knows what the future holds especially with immigration going down.
Include files	
Number	Question 34
ID	LPIO824
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	1 and 2 should still be considered.

Include files	
Number	Question 34
ID	LPIO870
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	1 and 2 should still be considered
Include files	
Number	Question 34
ID	LPIO990
Full Name	Mrs Saunders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We should resist building on green belt land at all costs. Once we have built on it, it can never be green belt again.
Include files	
Number	Question 34
ID	LPIO1016
Full Name	Dr Benjamin Heydecker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Continuing the current target (430 homes per year) is a realist and achievable contribution to the national requirement for increases in housing supply.
Include files	
Number	Question 34
ID	LPIO1048
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	See Q 16
Include files	
Number	Question 34
ID	LPIO1152
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	see previous
Include files	
Number	Question 34
ID	LPIO1153
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	see previous
Include files	
Number	Question 34
ID	LPIO1282
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	It is a subjective decision. It needs to be based on local supply of suitable land that is not within the Green Belt.
Include files	

Number	Question 34
ID	LPIO1335
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	I believe new homes should be built on a needs basis.
Include files	
Number	Question 34
ID	LPIO1460
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	Government figures are often incorrect, and are very likely to be incorrect in this case, since the calculation of growth demand is a very inexact science involving a great deal of speculation. As an example, the impacts of Brexit on population growth has not been taken into account. A growth figure based on Urban Capacity would seem reasonable, and would seem to support the Dacorum (and Government) strategic requirement to avoid encroachment onto Green belt land.
Include files	
Number	Question 34
ID	LPIO1636
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 retention of a build rate of 430 p.a. should be considered, given the infrastructure constraints.
Include files	
Number	Question 34
ID	LPIO1680

Full Name	Jenny Thorburn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Option 1
Include files	
Number	Question 34
ID	LPIO1714
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	The current housing target of 430 homes a year, is too many.
Include files	
Number	Question 34
ID	LPIO1814
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 34
ID	LPIO1899
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"> 'Urban Capacity' option should not have been rejected, please see previous comments in question 33.
Include files	
Number	Question 34
ID	LPIO1963
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	Current housing target of 430 is more than sufficient. (Please see comments on question 33 for the reasons).
Include files	
Number	Question 34
ID	LPIO2078
Full Name	Mr Christopher Giddings
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 34
ID	LPIO2150
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	Current housing target of 430 homes per year is more reasonable figure given the potential adverse effect on the Greenbelt.
Include files	
Number	Question 34
ID	LPIO2215

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 totally agree with rejection of c).</p> <p>I agree with John Shaw's comments on this question below.</p> <p>Brexit is something that should be taken into consideration and I don't think we should make decisions too hastily.</p> <p>I am concerned that 430 homes a year in the wrong places and using the wrong standards is too many.</p> <p>I am not convinced by the SHMA market assessment. I also think we should be building up our council housing stock again and not playing into the developers hands or committing ourselves to government figures that we can't fulfill due to Green Belt, Infrastructure and Local Objective and Vision constraints. We should stick to our Vision and to everything possible to ensure that we future-proof our current housing stock along with any new build.</p>
Include files	
Number	Question 34
ID	LPIO2294
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 34
ID	LPIO2342
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	See my responses to questions 16 and 33. There seems to be no case whatsoever for planning for 1100 or more homes a year. Opting for 430 or 476 homes a year would go a long way to resolving the huge level of concern surrounding the protection of the Green Belt, but I think it extremely unlikely that the government will allow DBC to adopt a figure less than its estimate of 602 homes per year.
Include files	
Number	Question 34
ID	LPIO2426
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	Continuing above the current housing target (430 homes a year) would seem nonsensical with proper and full consideration for infrastructure planning to meet needs and requirements. I never sever seen any projection related to infrastructure (no new schools / time span, no new doctor surgeries/ time span). Such infrastructure planning targets and information must be commensurate with any home targets.
Include files	
Number	Question 34
ID	LPIO2446
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 current target of 430 home a year is still not sustainable and could not be supported with the existing local infrastructure in Kings Langley and Apsley
Include files	
Number	Question 34
ID	LPIO2499
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 34
ID	LPIO2598
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	As per Q.33, the numbers requirement does not appear to have been demonstrated by reference to evidence that they fulfil 'need'
Include files	
Number	Question 34
ID	LPIO2684
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 development on greenbelt land. And if housing is planned for in future on brown site. Then it should be in keeping with the look of the village and not those ugly rabbit hutches that developers cram in.
Include files	
Number	Question 34
ID	LPIO2742
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	Ridiculous plan of housing development not required
Include files	

Number	Question 34
ID	LPIO2827
Full Name	mrs Gillian Hooper
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	lowest target should be used as planning basis.
Include files	
Number	Question 34
ID	LPIO2889
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"> • ‘Urban Capacity’ option should not have been rejected, • 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

	<p>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.</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 34
ID	LPIO2934
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	The 'Urban capacity' option seems a sensible approach, given the uncertainties as to whether high levels of growth are likely or attainable.
Include files	
Number	Question 34
ID	LPIO3013
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	Option 1
Include files	
Number	Question 34
ID	LPIO3103
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	You are wrong to reject 430 as the starting point. The Government consultation gives this as Dacorum's base as we have a valid Plan. Under the provisions of this consultation we can rely on this base number as we transition to the new Plan. Your interpretation that by next autumn we will be deemed to have no Plan is incorrect and it would be very interesting to know who exactly has advised you otherwise.
Include files	
Number	Question 34
ID	LPIO3175
Full Name	Mr George 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 34
ID	LPIO3189
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	
Include files	
Number	Question 34
ID	LPIO3285
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	For the same reasons as set out in our responses to Q16 and Q33, both rejected options 1 and 2 would also lead to the plan being found unsound.
Include files	
Number	Question 34
ID	LPIO3388
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) & b) should not have been rejected in Berkhamsted just because the target is a massive increase in homes on Green Belt.
Include files	
Number	Question 34
ID	LPIO3447
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	It is foolhardy to plan for more. Windfall sites will arise plus brownfield ones which will increase the numbers over time. Once a higher target is set developers will constantly push for the release of land which if refused could mean the loss of government payouts.

	Further work should be done once the register of brownfield sites is completed
Include files	
Number	Question 34
ID	LPIO3491
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	Options 1 and 2 should still be considered
Include files	
Number	Question 34
ID	LPIO3522
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	The urban capacity option of 476 homes should not have been rejected, especially considering the likely implications on population growth of Brexit and lower immigration.
Include files	
Number	Question 34
ID	LPIO3594
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	You have rejected lower house numbers without being clear enough why you need to adhere to higher numbers of developments. Herts County Council should be more strategic in considering a new planned town in a part of the County that can support such a big development. Cramming more homes into already stretched areas is not a good alternative to such strategic thinking.

	Dacorum is already the highest populated district in Herts and more residents will lead to more problems and lower quality of life for all.
Include files	
Number	Question 34
ID	LPIO3660
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	No. See reply to Question 16. The figure should be no higher than 430 p.a. However, we agree with the rejection of (2) and (3).
Include files	
Number	Question 34
ID	LPIO3732
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	'Urban Capacity' option - no new greenfield sites apart from existing proposals (476 homes a year) - is the only option, backed by economic development and public services.
Include files	
Number	Question 34
ID	LPIO3835
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	More consideration needs to be taken of the effect on the character of the village and the environment around it.
Include files	

Number	Question 34
ID	LPIO3847
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	No reason explaining the reason why the rejected growth option was rejected. I don't agree the point 3 of 1,100 homes a year.
Include files	
Number	Question 34
ID	LPIO3889
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 34
ID	LPIO3979
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 34
ID	LPIO4064
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	We should focus on the infrastructure we can deliver and build in line with the number - to build to a target is putting the cart before the horse.
Include files	
Number	Question 34
ID	LPIO4156
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	Option 1 A is the only one that comes close to what you should be doing
Include files	
Number	Question 34
ID	LPIO4159
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 34
ID	LPIO4201
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	Don't go above the government figure unless necessary.
Include files	
Number	Question 34
ID	LPIO4258
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	The current housing target of 430 homes a year, is too many. Option 1A is the only viable option this does not include Shendish site ref HH-h3
Include files	
Number	Question 34
ID	LPIO4274
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	Before Options 1 or 2 from this question can be rejected, DBC should 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 comprehensive Brownfield Register (required to be in place by Christmas 2017) will also contribute significantly to a reduction in the need to take greenfield / Green Belt land. These twooptions would not require the release of Green Belt land and consequently rejection is based on the Council's view that all other site and density options have been considered, and therefore that 'housing need' provides the exceptional circumstances required to consider the release of some Green Belt land. This is not true. In addition and as previously stated, 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. This would leave the four sites at Shendish, Hill Farm, Rectory Farm and Wayside Farm untouched.
Include files	
Number	Question 34
ID	LPIO4316

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	Don't understand why Urban capacity and a full audit of requirements isn't a starting point. I would like to see the make up of the current estimate of 800 houses required.
Include files	
Number	Question 34
ID	LPIO4386
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	Urban capacity should not have been rejected so easily. Green Belt should be excluded.
Include files	
Number	Question 34
ID	LPIO4422
Full Name	Mr Adrian Bate
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Again, any growth levels should equate to brownfield sites only.
Include files	
Number	Question 34
ID	LPIO4529
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	See Q 33
Include files	
Number	Question 34
ID	LPIO4584
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	the current housing target and the Urban Capacity option should also be considered. I agree with the rejection of the upper Government figure.
Include files	
Number	Question 34
ID	LPIO4645
Full Name	Miss Anna Nickalls
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 greenbelt is irreversible. Looking at Urban Capacity allows for expansion without damaging the land for future generations.
Include files	
Number	Question 34
ID	LPIO4647
Full Name	Mrs Caroline Nickalls
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Continuing the current target (430 homes per year) will protect the identity of the area and meet it's current housing requirements.
Include files	

Number	Question 34
ID	LPIO4667
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 34
ID	LPIO4759
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	'Urban Capacity' option should not have been rejected.
Include files	
Number	Question 34
ID	LPIO4792
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	option 1
Include files	
Number	Question 34
ID	LPIO4868
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	Yes. It is agreed that the alternative figures as set out should be rejected as part of this process, however the Council should also be looking to consider whether there are other suitable alternatives which should be considered on the basis of the inappropriateness of at least the higher growth number, as set out in our response to Question 33.
Include files	
Number	Question 34
ID	LP104906
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	1 and 2 should still be considered. Development must be at a controlled speed to monitor demand and there should be no upper limit that requires development on any Green Field sites in the borough.
Include files	
Number	Question 34
ID	LP104939
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	430 new homes per year with a maximum of 476 based on the Council's own figures are appropriate.,
Include files	
Number	Question 34
ID	LP104987
Full Name	Ms Anette Corbach
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 34
ID	LPIO5094
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	The current target of 430 homes per year should be considered as a starting point for further discussion, and only amended by compelling arguments as to why local housing need is going to increase so significantly. This is especially pertinent given that current political events may have a significant impact on several population drivers, i.e. Brexit and inward migration into the UK.
Include files	
Number	Question 34
ID	LPIO5152
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	yes i do object to the proposed numbers in relation to the areas put forward for local planned sites - they cannot cope already without 100s more to put a strain on every area of the local enironment
Include files	
Number	Question 34
ID	LPIO5215
Full Name	Ms Anne-Laure Mersier
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	We are in a rural area so we should build houses in line with this, which means slower than urban areas
Include files	

Number	Question 34
ID	LPIO5298
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 34
ID	LPIO5341
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 must be the targets for development, rather than guesstimating a number based on figures that may or may not be accurate.
Include files	
Number	Question 34
ID	LPIO5372
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	The last option would be infessible, thankfully. Don't see what's wrong with the current target.
Include files	
Number	Question 34
ID	LPIO5406
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	<p>Point 3 - above the upper government figure should be tested. The LPA's concern about the step change in delivery this will represent is noted as well as the possible environmental impacts. However, it is still a reasonable alternative as it may have to be delivered. It is useful to consider the National Infrastructure Commission (NICS) report into the Cambridge to Oxford Arc called 'Partnering for Prosperity'. The report paints a familiar picture of the difference between average earnings and average house prices within the arc. This picture is familiar and relevant to Hertfordshire. The report states; "These estimates of housing need exceed local estimates of objectively assessed needs developed by local authorities through their Strategic Housing Market Assessments. This discrepancy should not be a surprise – there is good reason to believe that the methodology used in undertaking assessments of local housing need can be conservative and can mask high levels of unmet need. Although local authorities are not consistent in their approach to calculating need, many use trend based household projections which are based on recent migration trends. In many cases historic migration has been suppressed by low housing supply, leading to underestimates of migration in areas with high levels of demand and growing housing needs. This is a national issue, but of particular relevance to the study area given high levels of demand for housing.</p> <p>Under the duty to cooperate there may be a requirement to meet housing needs arising from outside the area, not only from neighbouring authorities but from other constrained areas such as London. Therefore a higher figure should be tested as a reasonable alternative.</p>
Include files	
Number	Question 34
ID	LPIO5422
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	For all the reasons provided in the responses to the earlier 33 questions.
Include files	
Number	Question 34
ID	LPIO5470
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	In the absence of measures to encourage growth of small, new businesses *within Dacorum* (see response to Q21) building new homes will increase pressure on the local road network and rail links, which have already reached peak-hour capacity. Simply re-designating areas of Green Belt land as suitable for building does remove the infrastructure costs *already needed* to improve road and rail links (see Q12)
Include files	
Number	Question 34
ID	LPIO5543
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	Your reason for rejecting the current housing target is that it "does not reflect the level of development that is actually expected to come forward in the area". Doesn't the level of development depend on the plan? Isn't this an entirely circular argument?
Include files	
Number	Question 34
ID	LPIO5657
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	The 476 figure should not have been rejected so readily as it equates to no further release of Green Belt land for development - see your Appendix B. Protection of the Green Belt is one of your strategic aims, such an early rejection is contrary to your declared aims.
Include files	
Number	Question 34

ID	LPIO5698
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 34
ID	LPIO5756
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 in an area which is covered by important designations, like the Chilterns AONB, the process of establishing a housing figure in a local plan is supposed to involve OAN plus a process of considering constraints, which may well lower the appropriate amount of growth. The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number. The Urban Capacity option, plus any greenfield sites that do not harm important designations like the AONB (or its setting) would appear a sensible approach.
Include files	
Number	Question 34
ID	LPIO5902
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	See our response to question 16. Lower targets should also be explored which could be sustainable and matched with the capacity of local infrastructure.
Include files	

Number	Question 34
ID	LPIO5934
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	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.
Include files	
Number	Question 34
ID	LPIO6096
Full Name	Mr Richard Tregoning
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	Even 430 is too high see below Although many studies about numbers they seem to bear no relationship to National population growth which is considerably less than the proposal It seems time to revert to basics and ask when net immigration is going down and population growth in the plan period I quote below from the Office of National Statistics which is predicting a lower growth than we are being asked to absorb in area of low growth compared to Northern Power House etc In 2016 the population of the UK was 65.6 million, its largest ever. The UK population is projected to continue growing, reaching over 74 million by 2039.
Include files	
Number	Question 34
ID	LPIO6109
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	430 homes a year is way too much for such a small village.
Include files	
Number	Question 34
ID	LPIO6212
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>My preference would be to meet housing need using the Urban Capacity Option if this is possible.</p> <p>The justification for rejecting this Option set out in Appendix B is based on the proviso that all other site and density options have been considered AND the opinion of the Council that "housing need" provides the exceptional circumstances required to consider the release of some Green Belt land.</p> <p>As the Council is still inviting submissions promoting sites for development it cannot yet be known whether all brownfield sites have been identified and fully exploited. And the proviso itself invites the question whether all density options have yet been fully considered.</p> <p>Nor am I convinced that "housing need" provides the exceptional circumstances required to consider the release of some Green Belt land. There might well be other land that could be used to meet housing need, such as greenfield sites outside the Green Belt or land available as a result of urban regeneration or higher density housing.</p> <p>And if Welwyn Hatfield can look to Dacorum to help meet its housing need (see Appendix B, "Above upper Government figure" Option) there might be 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 34
ID	LPIO6297
Full Name	Mr Scott Bennett
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 34
ID	LPIO6298
Full Name	Mr Scott Bennett
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 34
ID	LPIO6432
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	On what grounds has the 'Urban Capacity' been rejected? There is much evidence (eg. Planning for the right homes in the right places: consultation proposals". 2012 Inquiry findings) to support a figure of 476 and the reasons for rejecting it are, basically, a self-fulfilling prophesy.
Include files	
Number	Question 34
ID	LPIO6498
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 34
ID	LP106678
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>Housing should be built on a needs basis. No one knows what the future holds especially with immigration going down. In addition, smaller families should be encouraged such as 2 children per couple ie one person, one child.</p> <p>Development must be at a controlled speed to monitor demand and there must be no development on any Green Field sites in the borough. I understand there have been recent statements made by the Chancellor of the Exchequer and Mayor of London ruling out Green Field development.</p> <p>We should resist building on green belt land at all costs. Once we have built on it, it can never be green belt again.</p>
Include files	
Number	Question 34
ID	LP106707
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 34
ID	LP106738
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	We have already been asked to comment on similar: start at 602 and fall back to 756 only of forced to. Absolutely reject 1100.
Include files	
Number	Question 34
ID	LPIO6747
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	
Include files	
Number	Question 34
ID	LPIO6819
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	
Include files	
Number	Question 34
ID	LPIO6852
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	Any additional housing must conform to the greenhouse gas reduction targets determined by the government in its ratification of the Paris Agreement. I consider increasing population with our modern standard of living

	as a conflict of interest to greenhouse gas reduction targets.
Include files	
Number	Question 34
ID	LPIO6959
Full Name	Mr David Zerny
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>Only the lower figure of 430 homes a year seems appropriate, assuming this is done sensitively, coupled with improved infrastructure, and protects the vital role the Green Belt plays in preventing urban sprawl.</p> <p>The higher targets fail to acknowledge the environmental limitations, and the huge impact that the M25 has had on the area already.</p> <p>Traffic levels are growing to a point where roads are often grid locked; and there is an argument that existing residents should be able to commute to their places of work in a reasonable amount of time, have good access to emergency services, and to schools.</p>
Include files	
Number	Question 34
ID	LPIO7034
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	<p>The brownfield estimate will not be published until 2008. How can you estimate numbers without it.</p> <p>There is no serious data to prove we must go beyond the minimum</p>
Include files	
Number	Question 34
ID	LPIO7124
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 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 Q34 - FULL DOC ATTACHED TO Q46</p> <p>Question 34</p> <p><i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <p><input type="checkbox"/></p> <p>'Urban Capacity' option should not have been rejected,</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</p>

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’,

	<p>BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly</p> <p>given the Governments recent strong commitments to preserving the Green Belt.</p> <p>□</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</p> <p>previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example,</p> <p>simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036</p> <p>would bring the SHMA's 'locally assessed needs' down to the 'draft Government numbers'. In short, growth options</p> <p>should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the</p> <p>recognised constraints as should the allocation of development. It should be recognised that predictions of need are</p> <p>subject to quite large margins of error given the various assumptions on which they are calculated.</p>
Include files	
Number	Question 34
ID	LP107335
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 34 (please note full document is attached to Q46)</p> <p>Question 34</p>

Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

No

'Urban Capacity' option should not have been rejected,

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

	<p>that the level of housing set out in a plan may be lower or higher than the local housing need</p> <p>.” Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’,</p> <p>BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly</p> <p>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,</p> <p>simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036</p> <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 34
ID	LPIO7376
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	Yes
Your response - Please add your response here	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>I attach the response of Chiltern and South Bucks District Council on your reg 18 Issues and Options consultation.</p> <p>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>This is broadly supported since the alternatives would likely not be reasonable in the light of government advice on the appropriate basis for planning to meet housing needs (continuing at Core Strategy lower growth / urban capacity based rates or rates significantly higher than the consultation on OAN methodology proposes for Dacorum BC). However the Councils would like to test the potential scope for Dacorum meeting housing needs within and beyond the plan period from adjacent areas where supply is constrained.</p> <p>FULL DOC ATTACHED TO Q46</p>
Include files	
Number	Question 34
ID	LPIO7403
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>Urban Capacity' option should not have been rejected, 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> <p>Urban capacity has to be the starting point for such calculations</p>
Include files	
Number	Question 34
ID	LPIO7681
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	No The 'Urban Capacity' option should not have been rejected, because with it, DBC could meet its proposed target of 476 homes without having to encroach on Green Belt land. There are viable options for achieving this.
Include files	
Number	Question 34
ID	LPIO7921
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 34
ID	LPIO7960
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 Q34 <input type="checkbox"/> 'urban Capacity'option should not have been rejected, <input type="checkbox"/> 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 'locally assessed need'

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

	<p>given the Governments recent strong commitments to preserving the Green Belt.</p> <p><input type="checkbox"/></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 '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.</p>
Include files	
Number	Question 34
ID	LPIO8009
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>See response to questions 16 and 33. In summary, It is neither reasonable nor appropriate 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><i>[Response to Q16: It is neither reasonable nor appropriate to set a housing target above what is achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year. DBC quoted 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.]</i></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 reassessment 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”, whose paragraph 9 states 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.”

There are well-founded reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, and a confusion between need and demand – the latter being almost completely driven by the volume house-building industry. The constraints of the Dacorum area mean that the Urban Capacity has to be the starting point, particularly given the Governments very recent strong commitments to preserving the Green Belt.

The draft plan paragraph 6.1.14 is dangerously misleading. The Government consultation referred to above 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. Its inclusion seems somewhat revelatory of Dacorum planners’ mindset.]

[Response to Q33: Even this estimate underestimates the contribution from “windfalls”, which continue to arise at around 100 each year. It is accepted that at some point in the future this number may reduce, but full rather than grudging partial recognition of their contribution must be made.]

Include files	
Number	Question 34
ID	LP108384
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 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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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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- 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 34
ID	LPIO8400
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 “*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 34
ID	LPIO8415
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 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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO8459
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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

	<p>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</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 34
ID	LPIO8478
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	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.

However, I/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 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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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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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

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Include files	
Number	Question 34
ID	LPIO8496
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 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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected,

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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 SHMA's 'locally assessed needs' down to the 'draft

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Include files	
Number	Question 34
ID	LPIO8677
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- Continuing 430pa and the Urban capacity options should also be considered. 2- The economic outlook is bleak, so need and demand are likely to decrease. 3- We will need as much farmland as possible when we leave the EU.
Include files	
Number	Question 34
ID	LPIO8702
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 34
ID	LPIO8882
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	Q34-, NO-urban capacity option should not have been rejected.
Include files	
Number	Question 34
ID	LPIO8962
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	The 'Urban Capacity' option should not have been rejected, because with it, DBC could meet its proposed target of 476 homes without having to encroach on Green Belt land. There are viable options for achieving this.
Include files	
Number	Question 34
ID	LPIO9034
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 The 'Urban Capacity' option should not have been rejected.
Include files	
Number	Question 34
ID	LPIO9041
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	<p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <p>The 'Urban Capacity' option should not have been rejected.</p>
Include files	
Number	Question 34
ID	LP109163
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>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>
Include files	
Number	Question 34

ID	LPIO9356
Full Name	KENNETH NEWELL
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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 34
ID	LPIO9362
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 34
ID	LPIO9540
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	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.

	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.
Include files	
Number	Question 34
ID	LPIO9642
Full Name	JAMES ROTHNIE
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Of the consultation on the Dacorum website answer 1B to question 40 seems to be the least bad option, although it should be emphasised that no further development in Berkhamsted is the only sensible option.
Include files	
Number	Question 34
ID	LPIO9779
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>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</i></p>

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
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- 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

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Include files	
Number	Question 34
ID	LPIO9827
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.

However, we 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 34
ID	LPIO9940
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> <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.</p>
Include files	
Number	Question 34
ID	LPIO10002
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 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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected,

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Include files	
Number	Question 34
ID	LPIO10050
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. 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</p>

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- 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 34
ID	LPIO10119
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 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</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 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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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>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 34
ID	LPIO10167
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>

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO10224
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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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	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 34
ID	LPIO10271
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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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>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 34
ID	LPIO10321
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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
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Include files	
Number	Question 34
ID	LPIO10370
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 34 (please note full document is attached to Q46)</p>

Question 34 Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

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Include files	
Number	Question 34
ID	LPIO10435
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</p>

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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>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 34
ID	LPIO10484
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</i></p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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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- 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 34
ID	LPIO10534
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

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 would however like to make a few specific comments.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO10582
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO10629
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p>

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Include files	
Number	Question 34
ID	LPIO10679
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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

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Include files	
Number	Question 34
ID	LPIO10727
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	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.

However, I would like to emphasise a few of the most important points within that response that I strongly agree with:

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 has not considered the rejected options properly.

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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Include files	
Number	Question 34
ID	LPIO10761
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	<ul style="list-style-type: none"> • Finally, discussions are ongoing in respect of the Duty to Cooperate and as noted at paragraph 6.1.17 of the Issues and Options paper, it may be necessary for Dacorum to meet unmet needs of neighbouring authorities, subject to the outcome of Duty to Cooperate discussions <p>For full response please see question 46</p>
Include files	
Number	Question 34

ID	LPIO10821
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>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 34 (please note full document is attached to Q46)</p>

Question 34 Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

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	<p>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 34
ID	LPIO10873
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>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</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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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>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 34
ID	LPIO10921
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</p>

	<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.”</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 34
ID	LP1010971
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</i></p>

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BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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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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 34
ID	LPIO11021
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 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 34 (please note full document is attached to Q46)</p> <p><i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO11068
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 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 34
ID	LPIO11101

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	The 'Urban Capacity' option should not have been rejected, because with it, DBC could meet its proposed target of 476 homes without having to encroach on Green Belt land. There are viable options for achieving this.
Include files	
Number	Question 34
ID	LPIO11148
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"> • 'Urban Capacity' option should not have been rejected, • 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

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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 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 34
ID	LPIO11195
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	Not enough detailed assessment to be able to answer.
Include files	
Number	Question 34

ID	LPIO11242
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>

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Include files	
Number	Question 34
ID	LPIO11292
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-</p>

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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 34
ID	LPIO11311
Full Name	Rachel Hesslegrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>While we understand the need for more housing across the UK and the benefits for employment and investment that can follow from building projects, we do not believe that Berkhamsted can take the level of development proposed in <i>any</i> of the options put forward within the current consultation. We think that the benefits would be significantly better distributed in local areas where:</p> <ul style="list-style-type: none"> • urban regeneration is desperately needed • there is some capacity for development without devastating impact on the existing population and/or Green Belt <p>homes being built will be sufficiently affordable to genuinely meet the needs of those who require the expansion.</p> <p>Within your consultation, Option 1B Question 40 provides the least-worst option. However, in our view none of your</p>

	options offer a realistic basis for a new and achievable local plan. In particular, there must be an explanation from planners as to why home-building in Hemel Hempstead (at 21% under planned development ten years into the current Core Strategy) has not already happened. Without addressing this, and without a proper plan to resolve the issue (for example by setting out significantly more robust, demanding and reciprocal agreements with developers to ensure that they cannot 'call all the shots' and build only where they wish and where their returns will be greatest for least inward investment) there can be no prospect of fair, sustainable and achievable local development across Dacorum moving forward.
Include files	
Number	Question 34
ID	LPIO11315
Full Name	Mark Hesslegrave
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	<p>While we understand the need for more housing across the UK and the benefits for employment and investment that can follow from building projects, we do not believe that Berkhamsted can take the level of development proposed in <i>any</i> of the options put forward within the current consultation. We think that the benefits would be significantly better distributed in local areas where:</p> <ul style="list-style-type: none"> • urban regeneration is desperately needed • there is some capacity for development without devastating impact on the existing population and/or Green Belt <p>homes being built will be sufficiently affordable to genuinely meet the needs of those who require the expansion.</p> <p>Within your consultation, Option 1B Question 40 provides the least-worst option. However, in our view none of your options offer a realistic basis for a new and achievable local plan. In particular, there must be an explanation from planners as to why home-building in Hemel Hempstead (at 21% under planned development ten years into the current Core Strategy) has not already happened. Without addressing this, and without a proper plan to resolve the issue (for example by setting out significantly more robust, demanding and reciprocal agreements with developers to ensure that they cannot 'call all the shots' and build only where they wish and where their returns will be greatest for least inward investment) there can be no prospect of fair, sustainable and achievable local development across Dacorum moving forward.</p>

Include files	
Number	Question 34
ID	LPIO11381
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 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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO11431
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

I am writing in response to the current consultation to register my views on the proposals.

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.

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.

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 34 (please note full document is attached to Q46)

Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

- 'Urban Capacity' option should not have been rejected,
- 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
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Include files	
Number	Question 34
ID	LPIO11483
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 34
ID	LPIO11537
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>a.) 430 homes per year. No I do not agree with the rejection of this growth level, which is the current target in the approved 2006-2031 Core Strategy. It is right that OAN for housing is reassessed, but it is not right that the previous target should be rejected out of hand. Rather, it should be the starting point for further analysis.</p> <p>b.) 476 homes per year. No I do not agree with the rejection of this growth level, which is the Council's calculation of urban capacity. This is the most logical housing target for the new Local Plan as it takes into account both the currently approved target of 430 homes per year (which includes the recent removal of 82.2 hectares of land from the Green Belt via the 6 Local Allocations in the Core Strategy) and then uplifts the 430 figure to take account of a reassessment of what growth is possible within the existing urban envelope. A figure higher than 476 homes per year should be robustly defended against by the Council because meeting a higher figure will mean breaching the borough's legitimate geographical constraints of the Chilterns AONB and the Green Belt. And as I stated in my answer to Questions 4 and 6, Dacorum must take a stand openly and transparently that OAN cannot be fully met, due to the constraints created by the AONB and Green Belt</p>

	<p>land. This is a legally justified and sound reason for not fully meeting OAN.</p> <ul style="list-style-type: none"> A recent case (September 2017) in which the Government Planning Inspector has found a Local Plan sound despite it not fully meeting its OAN is the Adur District Council Local Plan in Sussex. The Council's OAN is 325 homes per year whereas the Local Plan target is "a minimum" of 177 homes per year. The Inspector's report is at http://www.adur-worthing.gov.uk/media/media,146237,en.pdf. The Inspector finds (in paragraph 47) that the Council cannot meet its full OAN because of the "significant constraints that exist" one of which is the need to preserve the "local green gaps". Surely if this applies to "local green gaps" it applies even more powerfully to Green Belt and to Areas of Outstanding Natural Beauty both of which are accorded significantly greater protection under the National Planning Policy Framework. (Note the Inspector in the Adur case was David Hogger, who was also the Inspector for Dacorum's Core Strategy). <p>c.) 1100+ homes year. Yes I agree with rejecting this growth level which is "significantly above the upper Government figure". The Government has yet to reach a conclusion from its recent "Right Homes Right Places" consultation on OAN methodology, so to label any figure as a "Government figure" is misleading.</p>
Include files	
Number	Question 34
ID	LPIO11560
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>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</p>

	<p>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.</p> <p>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.</p>
Include files	
Number	Question 34
ID	LPIO11619
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</p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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

	<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</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 34
ID	LPIO11706
Full Name	Susanne Rees
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 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 34
ID	LPIO11773
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO11814
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	
Include files	
Number	Question 34
ID	LPIO11923
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	See Q 16. The retention of a target build rate of c. 430 pa should be considered given the infrastructure constraints.
Include files	
Number	Question 34
ID	LPIO11969
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 34
ID	LPIO12071
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 34. Please note full document is attached to Question 46</p>

Question 34 Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

- 'Urban Capacity' option should not have been rejected,
- 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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- 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 34
ID	LPIO12165
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</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. 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 34. Please note full document is attached to Q46.

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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>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 34
ID	LPIO12184
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	<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 34
ID	LPIO12226
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>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO12305
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</p>

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Include files	
Number	Question 34
ID	LPIO12371
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 34
ID	LPIO12396
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	Urban capacity should not have been rejected so easily. Green Belt should be excluded.
Include files	
Number	Question 34
ID	LPIO12414
Full Name	ms rona morris

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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 34
ID	LPIO12449
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</p>

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Standard BRAG response to Question 34. Please note full document is attached to Question 46.

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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Include files	
Number	Question 34
ID	LPIO12497
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</p>

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BRAG response to Question 34 (please note full document is attached to Q46)

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Include files	
Number	Question 34
ID	LPIO12544
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

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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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 - 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 34
ID	LPIO12594
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>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 34 (please note full document is attached to Q46)</p>

Question 34 Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO12643
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</p>

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BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
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Include files	
Number	Question 34
ID	LPIO12692
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</i></p>

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 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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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 capacity.
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	<p><i>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 34
ID	LPIO12740
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>

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO12789
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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</i>

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Include files	
Number	Question 34
ID	LPIO12836
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</p>

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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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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Include files	
Number	Question 34
ID	LPIO12884
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

Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.

...

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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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 capacity.
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Include files	
Number	Question 34
ID	LPIO12938
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</p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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>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</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 34
ID	LPIO12987
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</p>

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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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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 34
ID	LPIO13036
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 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 34 below (full BRAG response see question 46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO13089
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 34(please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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>

	<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 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 34
ID	LPIO13137
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>

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO13195
Full Name	Mr J G Botha
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Option 1
Include files	
Number	Question 34
ID	LPIO13262
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</p>

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BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

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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 capacity
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Include files	
Number	Question 34
ID	LPIO13414
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 34
ID	LPIO13415
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 34
ID	LPIO13471
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>'Urban Capacity' option - no new greenfield sites apart from existing proposals should be considered.</p> <p>The other two proposals should be ignored.</p> <p>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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</i>

	<p>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</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 34
ID	LPIO13519
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>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO13574
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>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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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</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</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 34
ID	LPIO13627
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</p>

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO13689
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</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.

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO13754
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>

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. It is accepted that Local Authorities have to calculate housing need.

They must however note that 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. In so doing should the amount should equate to a minimum of three years 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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO13805
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 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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 calculated.
Include files	
Number	Question 34
ID	LPIO13860
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>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</p>

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BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO13949
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 34
ID	LPIO13990
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 34
ID	LPIO14029
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO14078
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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</i>

	<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 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 34
ID	LPIO14126
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</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.

BRAG response to Question 34 (please note full document is attached to Q46)

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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 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 34
ID	LPIO14177
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 assessed need', BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the

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Include files	
Number	Question 34
ID	LPIO14321
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</p>

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.

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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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 34
ID	LPIO14327
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>See Q 16. The retention of a build rate of c. 430 pa should be considered given the infrastructure constraints.</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

	<p>of 756 pa implying the <i>demand</i> for open market dwellings is 390 pa.</p> <ul style="list-style-type: none"> • 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 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 <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 34
ID	LPIO14346
Full Name	Mrs J M Sparks
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	I fail to understand why, having robustly defended annual growth of 430 homes 3-4 years ago, our Councillors and Planners are now promoting a 75% increase?
Include files	
Number	Question 34
ID	LPIO14361
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	a) continuing the current housing target (430 homes/year)
Include files	
Number	Question 34
ID	LPIO14406
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 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</p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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Include files	
Number	Question 34
ID	LPIO14455
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>.</p> <p>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • ‘Urban Capacity’ option should not have been rejected,

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Include files	
Number	Question 34
ID	LPIO14504
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 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</i></p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- 'Urban Capacity' option should not have been rejected,
- 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 "*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 34
ID	LPIO14708
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 34
ID	LPIO14717
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 34
ID	LPIO14781
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected,

- 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 34
ID	LPIO14813
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	In the interim period, whilst we await government guidance on the methodology to use to calculate housing need, the current housing target of 430 homes/year, as agreed in the Core Strategy is the only growth target that has been statutorily approved. 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 34
ID	LPIO14853
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 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.

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Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

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- 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 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 34
ID	LPIO14899
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>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 34
ID	LPIO14956
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 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</i></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.” 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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	<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</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 34
ID	LPIO15006
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.

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Include files	
Number	Question 34
ID	LPIO15054
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>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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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

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	margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 34
ID	LPIO15283
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 34 (please note full document is attached to Q46)</p> <p>Question 34: Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO15333
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO15347
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>

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

- 'Urban Capacity' option should not have been rejected,
- 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

	<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 34
ID	LPIO15382
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO15404
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 It is argued in the consultation that a new town is unviable because it will take longer than this planning period to accommodate. That is a recipe for simply continuing to make short term decisions at the expense of longer term efficiency. You should consider what that proposal would look like and if it is the preferred long term solution then present this case to the Secretary of State. A long term plan to generate what would be a back loaded housebuilding programme is a very rational response. This might lead to a conclusion to either revisit the new town idea or to focus the minimal development on Hemel Hempstead which has received the greatest infrastructure development and not taken up its proportionate share of additional houses in recent years.</p>
Include files	
Number	Question 34
ID	LPIO15444
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>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</p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO15492
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

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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 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 34
ID	LPIO15549
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 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.

Include files	
Number	Question 34
ID	LPIO15598
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

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO15664
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO15723
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO15771
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</p>

	<p>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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO15818
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>The ‘Urban Capacity’ option should not have been rejected, because with it, DBC could meet its proposed target of 476 homes without having to encroach on Green Belt land. There are viable options for achieving this.</p> <p>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • ‘Urban Capacity’ option should not have been rejected, • 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 34
ID	LPIO15876
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 consider that Options 1 and 2 posed in this question have been correctly discounted through the plan making process and do not warrant any further meaningful consideration • The basis for this is the guidance in paragraph 47 of the Framework relating to the need to assess the OAN and the extensive work which has already been undertaken by the Council in preparing the SHMA • Notwithstanding the documented concerns about any reliance being placed on the Government's standard housing numbers methodology, it has to be recognised that the 602 figure was seen in the guidance as the <u>minimum</u> figure the Council should be planning for through the Local Plan Review. Paragraph 47 of the consultation paper makes it clear that: <i>"There should be very limited grounds for adopting an alternative method which results in a lower need than our proposed approach."</i> <ul style="list-style-type: none"> • As a result, given the above concerns, Options 1 and 2 are simply untenable as starting positions and have been rightly discounted as housing target options for considerations. • With regard to higher levels of development DBLP do not have any specific views about not discounting higher levels of growth, it is just not considered necessary for its development aspirations at Markyate to be realised
Include files	
Number	Question 34
ID	LPIO15985
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>Rejected options 1 and 2 (below 602 dpa) would not meet the lowest assessment of housing need in Dacorum BC and would lead to housing pressures being diverted to areas outside Dacorum.</p> <p>Rejected option 3 (1,100+ dpa) is not realistic since it would be difficult to accommodate physically and unlikely to be delivered by the market.</p>
Include files	
Number	Question 34
ID	LPIO16012
Full Name	Charlotte Ryan-Elliott
Company / Organisation	Kier Property
Position	Planner`
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"> We agree that, as a minimum, the actual level of housing need is delivered (1,100 homes per annum). However, we would argue, that in line with the housing supply and demand chapter of this report, the housing need is greater than 1,100 homes per annum due to the need for: the expected shortfall arising from within the HMA; in addition to helping to address London's housing shortfall (in line with the adopted London Plan; as consolidated with alterations since 2011). We would also argue that the identified supply of 10,940 dwellings is not robust and we would urge the Council to take account of the findings in the supply and demand chapter of this report before progressing on this basis.
Include files	
Number	Question 34
ID	LPIO16076
Full Name	Dave Thomas
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>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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 34</p>
<p>ID</p>	<p>LPIO16130</p>
<p>Full Name</p>	<p>Helen and Aaron Talbot</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>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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>

Include files	
Number	Question 34
ID	LPIO16189
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16246
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 34, full document attached to question 46</p>

	<p>1 Continuing the current housing target (430 homes a year)</p> <p>2 “Urban Capacity” Option (476 homes a year); and</p> <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16307
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 34, full document attached to question 46</p> <p>1 Continuing the current housing target (430 homes a year)</p> <p>2 “Urban Capacity” Option (476 homes a year); and</p> <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16369
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16417
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</i></p>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- ‘Urban Capacity’ option should not have been rejected,
- 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*

	<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 34
ID	LPIO16482
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16558
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 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> . ‘Urban Capacity’ option should not have been rejected, . 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

	<p>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.</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 34
ID	LP1016693
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	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

	<p>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 34
ID	LPIO16725
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 34
ID	LPIO16748
Full Name	Martin Ephgrave
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 agree with the council that it is no longer appropriate to continuing the current housing target (430 homes a year) as this would fall well short of meeting housing need.</p> <p>We also agree that the 'Urban Capacity' option, which proposes no new greenfield sites apart from existing proposals (476 homes year), would also fall well short of meeting housing needs and would not comply with the NPPF (the NPPF does not seek to block</p>

	<p>development on greenfield sites which can provide a valuable source of housing).</p> <p>We would usually seek that a level of housing growth above the objectively assessed need be tested, on the basis that the NPPF does not seek to cap the delivery of housing, and there is an overall need for new homes across the south east of England. However, in this instance we do not consider that it would be appropriate to pursue a level of growth that is significantly above the upper Government figure (1,100 homes a year). The proposed Government figure is already 2.5 times higher than the Adopted Core Strategy which seeks an average of 430 net additional dwellings per year, and we do not consider that a significant increase above this would be deliverable over the plan period.</p>
Include files	
Number	Question 34
ID	LPIO16841
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16909
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO16997
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>

Include files	
Number	Question 34
ID	LPIO17054
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO17111
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is</p>

	not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.
Include files	
Number	Question 34
ID	LPIO17246
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>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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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

	<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 34
ID	LPIO17302
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>5.It is unreasonable to set a target of 476 dwellings per year.</p> <p>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO17358
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO17410
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	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.

Berkhamsted Citizens Association response to question 34 below (copy of full response attached to question 46)

Do you agree with the rejection of the following growth levels:

No

- See Q 16 (copy below)

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
- 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 34
ID	LPIO17465
Full Name	Sara Bell
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 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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 34</p>
<p>ID</p>	<p>LPIO17524</p>
<p>Full Name</p>	<p>Emma Talbot</p>
<p>Company / Organisation</p>	<p>The Little Cloth Rabbit</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>Please find attached a report (GFRA) about the proposed development of Tring.</p> <p>...</p> <p>GFRA Response to Question 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
<p>Include files</p>	

Number	Question 34
ID	LPIO17572
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 34 below (copy of full response attached to question 46)</p> <p><i>Do you agree with the rejection of the following growth levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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 34
ID	LPIO17631
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO17661
Full Name	Guinness Partnership
Company / Organisation	Guinness Partnership
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	yes – the Council does not appear to have considered the DCLG figure of 1,000 houses. It must do so.
Include files	
Number	Question 34
ID	LPIO17705

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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO17754
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 34 below - full document attached to Question 46</p> <p><i>Do you agree with the rejection of the following growth levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below)

	<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 34
ID	LPIO17810
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 34, full document attached to question 46</p> <p>1 Continuing the current housing target (430 homes a year)</p> <p>2 “Urban Capacity” Option (476 homes a year); and</p>

	We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.
Include files	
Number	Question 34
ID	LPIO17868
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO17926
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO17975
Full Name	Mr Michael Burbidge
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 the lower levels of housing the plan implies that it will build on green belt land and will be encouraging economic and population growth in SE England rather than supporting a plan improve the development opportunities in the rest of the UK.
Include files	
Number	Question 34
ID	LPIO18035
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	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

	<p>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 points.</p> <p>GFRA Response to Question 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO18106
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34

ID	LPIO18163
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO18220
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been</p>

	considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.
Include files	
Number	Question 34
ID	LPIO18274
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>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 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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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

	<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 34
ID	LPIO18333
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing</p>

	allocation sites has yet to be fully and comprehensively assessed.
Include files	
Number	Question 34
ID	LPIO18361
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	Yes
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 agree with the council that it is no longer appropriate to continuing the current housing target (430 homes a year) as this would fall well short of meeting housing need.</p> <p>We also agree that the 'Urban Capacity' option, which proposes no new greenfield sites apart from existing proposals (476 homes year), would also fall well short of meeting housing needs and would not comply with the NPPF (the NPPF does not seek to block development on greenfield sites which can provide a valuable source of housing).</p> <p>We would usually seek that a level of housing growth above the objectively assessed need be tested, on the basis that the NPPF does not seek to cap the delivery of housing, and there is an overall need for new homes across the south east of England. However, in this instance we do not consider that it would be appropriate to pursue a level of growth that is significantly above the upper Government figure (1,100 homes a year). The proposed Government figure is already 2.5 times higher than the Adopted Core Strategy which seeks an average of 430 net additional dwellings per year, and we do not consider that a significant increase above this would be deliverable over the plan period.</p>
Include files	
Number	Question 34
ID	LPIO18501
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 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO18548
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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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	margins of error given the various assumptions on which they are calculated.
Include files	
Number	Question 34
ID	LPIO18594
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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</i>

	<p>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 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 34
ID	LPIO18640
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 levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (Below) <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 34
ID	LPIO18687
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>

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 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO18733
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>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.</p> <p>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p>

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO18779
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 levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (Below) <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 34
ID	LPIO18828
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</p>

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BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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 34
ID	LPIO18875
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</p>

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Include files	
Number	Question 34
ID	LPIO18921
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	I entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).

...

BRAG response to Question 34 (please note full document is attached to Q46)

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Include files	
Number	Question 34
ID	LPIO18946
Full Name	Rupert Symmons
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 the urban capacity option should also be considered – development of the greenbelt will result in irreversible harm.
Include files	
Number	Question 34
ID	LPIO18999
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 with the proposed increase to the town. Please read and include the report findings in your final decision.

	<p>GFRA Response to Question 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19062
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>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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> <ol style="list-style-type: none"> 1 D) 476 Urban Capacity with a figure of less than 602 as per the Government’s draft figure <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 34
ID	LPIO19119
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 "Urban Capacity" Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34

ID	LPIO19177
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19235
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 34, full document attached to question 46</p>

	<p>1 Continuing the current housing target (430 homes a year)</p> <p>2 “Urban Capacity” Option (476 homes a year); and</p> <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19292
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 34, full document attached to question 46</p> <p>1 Continuing the current housing target (430 homes a year)</p> <p>2 “Urban Capacity” Option (476 homes a year); and</p> <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>

Include files	
Number	Question 34
ID	LPIO19310
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 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 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>

	It is important that the Dacorum Local Plan makes a significant contribution to the Government's strategy for housing and economic growth.
Include files	
Number	Question 34
ID	LPIO19346
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 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>

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Include files	
Number	Question 34
ID	LPIO19396
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 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</p>

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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 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*

	<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 34
ID	LPIO19442
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 34</p> <p><i>Do you agree with the rejection of the following growth levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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. 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 34
ID	LPIO19497
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 34, full document attached to question 46</p> <p>1 Continuing the current housing target (430 homes a year)</p> <p>2 “Urban Capacity” Option (476 homes a year); and</p>

	We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.
Include files	
Number	Question 34
ID	LPIO19554
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19612
Full Name	Mark Lawson and Sharon Wilkie
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 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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
<p>Include files</p>	
<p>Number</p>	<p>Question 34</p>
<p>ID</p>	<p>LPIO19668</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>No</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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has</p>

	not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.
Include files	
Number	Question 34
ID	LPIO19727
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19781
Full Name	Ben Barth
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>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 34</p> <p><i>Do you agree with the rejection of the following growth levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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. • 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.
<p>Include files</p>	
<p>Number</p>	<p>Question 34</p>
<p>ID</p>	<p>LPIO19850</p>
<p>Full Name</p>	<p>Jon Esson</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	<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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19934
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO19991

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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20048
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year)

	<p>2 “Urban Capacity” Option (476 homes a year); and</p> <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20105
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20163
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LP1020220
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</p>

	<p>correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>GFRA Response to Question 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 "Urban Capacity" Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20268
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO20323
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 "Urban Capacity" Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20381
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20429
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO20490
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20538
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

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.

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.

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.

BRAG and Berkhamsted Citizens responses to this question are below - (the full document response are attached to the two Question 46

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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 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 Citizens response

Do you agree with the rejection of the following growth levels:

No

- See Q 16 (copy below)

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

	<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 34
ID	LPIO20585
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 levels:</i></p> <p>No</p> <ul style="list-style-type: none"> • See Q 16 (copy below) <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.

	<p>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</p> <ul style="list-style-type: none"> • 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 34
ID	LPIO20657
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 "Urban Capacity" Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20713

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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO20761
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>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

	<p>new register is published the figures used are in question</p> <ul style="list-style-type: none"> • 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 34
ID	LPIO20809
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 Lower options should be considered due to infrastructure limitations.
Include files	
Number	Question 34
ID	LPIO20855
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO20931
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 Government’s recent strong commitments to preserving the Green Belt

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Include files	
Number	Question 34
ID	LPIO20986
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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</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.” 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 34 *Do you agree with the rejection of the following growth levels:*

See Q 16. The retention of a target build rate of c. 430 pa should be considered given the infrastructure constraints.

Include files	
Number	Question 34
ID	LPIO21071
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO21136
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 34, full document attached to question 46</p> <ol style="list-style-type: none"> 1 Continuing the current housing target (430 homes a year) 2 “Urban Capacity” Option (476 homes a year); and <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO21212

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 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 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 "<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 I,

	<p>together with BRAG have grave reservations about the methodology in the SHMA which calculated DBC's 'locally assessed need', we both 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.</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 34
ID	LPIO21260
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 in an area which is covered by important designations, like the Chilterns AONB, the process of establishing a housing figure in a local plan is supposed to involve OAN plus a process of considering constraints, which may well lower the appropriate amount of growth. The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number. The Urban Capacity option, plus any greenfield sites that do not harm important designations like the AONB (or its setting) would appear a sensible approach.</p>
Include files	

Number	Question 34
ID	LPIO21335
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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

	<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 34
ID	LPIO21381
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	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.

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.

BRAG response to Question 34 (please note full document is attached to Q46)

Question 34 *Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?*

No

- 'Urban Capacity' option should not have been rejected,
- 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

	<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 34
ID	LPIO21407
Full Name	James Good
Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Question 34: Do you agree with the rejection of the following growth levels?</i></p> <p><u>Response:</u></p> <p>Yes</p> <p><u>Details:</u></p> <p>We agree that the rejection of the other growth levels is a reasonable basis on which to progress with the Local Plan.</p>
Include files	
Number	Question 34
ID	LPIO21498
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	<p>Question 34 Do you agree with the rejection of the following growth levels: Yes</p> <p>We agree that the rejected figures are either too low or too high and are not realistic or necessary for the Borough.</p>
Include files	
Number	Question 34
ID	LPIO21561
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 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO21618
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 34, full document attached to question 46</p> <p>We agree in principle with the rejection of the approach to the growth levels however it should be noted that it is not considered that the Urban Capacity option has been considered exhaustively; once again the consideration of density, scale and massing with regard to brownfield sites and their efficiency in housing supply delivery has not been fully considered and as such the actual consideration of using only brownfield and existing allocation sites has yet to be fully and comprehensively assessed.</p>
Include files	
Number	Question 34
ID	LPIO21718
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</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

- ‘Urban Capacity’ option should not have been rejected,
- 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 34
ID	LPIO21769
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	Appendix B incorrectly refers to housing need as providing the exceptional circumstances required to consider the release of some Green Belt land. This statement should be deleted because housing need alone is not an exceptional circumstance.
Include files	
Number	Question 34
ID	LPIO21830
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 B of the Issues and Options consultation document.
Include files	
Number	Question 34
ID	LPIO21901
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"> • 'Urban Capacity' option should not have been rejected • 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 34
ID	LPIO21936
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>BRAG response to Question 34 (please note full document is attached to Q46)</p> <p>Question 34 <i>Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?</i></p> <p>No</p> <ul style="list-style-type: none"> • 'Urban Capacity' option should not have been rejected, • 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>"

	<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 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 34
ID	LPIO21970
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>See Q 16. The retention of a target build rate of c. 430 pa should be considered given the infrastructure constraints.</p>
Include files	

Number	Question 34
ID	LPIO22047
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 34
ID	LPIO22082
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>We do not agree with the rejection of growth levels 1 and 2 above and do not agree with the statements set out in paragraphs 6.2.9 or 10.1.8 (Option 1) I&O which concludes that some 3,560 dwellings across the Borough would need to be found on greenfield / Green Belt sites.</p> <p>Option 1 - Continuing the current housing target (430 homes a year): This option is based on a lower provision than technical studies show is likely to be accommodated over the Plan period. However, these technical studies include the release of sites within the Green Belt which for reasons set out elsewhere, we disagree with. We do not consider that exceptional circumstances have been shown to release sites from the Green Belt, nor do we agree with the conclusions of the Green Belt Review which suggest that areas around Kings Langley do not meet all the criteria for continued Green Belt designation.</p>

Therefore, the conclusion that technical studies show a higher housing provision will be accommodated over the Plan period is challenged.

Option 2 – Urban Capacity Option (476 homes a year): This option equates to the calculated urban capacity of the Borough and would not require any further release of Green Belt. Rejection of this option is based on the Council’s view that all other site and density options have been considered, and therefore that ‘housing need’ provides the exceptional circumstances required to consider the release of some Green Belt land. As above, we do not agree with this statement but also consider that insufficient work has been carried out to maximise housing provision using urban sites and previously developed land. For instance, the Brownfield Register has not yet been prepared or published which may reveal further suitable sites for development. Neither do we consider that sufficiently robust discussions have taken place or have yet concluded with neighbouring authorities in relation to cross boundary issues under the Duty to Cooperate. The allocation of housing and employment floorspace within the Three Rivers portion of Kings Langley should reasonably be related to the Dacorum figures as the redevelopment of this area relates strongly to the main portion of the village which lies within Dacorum. The same applies to the Gorhambury land at East Hemel within St Albans District.

Option 3 – Above upper Government figure (1,100 + homes a year): We agree that this figure is unrealistic and would be impossible to deliver considering the significant constraints present within Dacorum (Green Belt, AONB, SAC) which would be materially affected adversely by this level of development. Neither does there appear to be a need for this higher level of housing as the timetable for adopting this early review is anticipated to be completed within five years of adoption of the Core Strategy; there has been no request from neighbouring authorities within the HMA to accommodate significant unmet needs for their areas and there is no requirement to consider meeting unmet needs from an adjoining HMA.

QUESTION 34 Rejection of Growth levels - Summary Representation and Response Sought:

Before Options 1 or 2 can be rejected, 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.

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.

Include files	
Number	Question 34
ID	LPIO22104

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	We concur that there is not a sound basis for options (a) and (b) but as set out in our response to Q16 it may be appropriate to plan to meet a slightly higher level of need that the draft CLG figure (1,100 dpa) in response to the Government's revised objectives set out in the budget.
Include files	
Number	Question 34
ID	LPIO22148
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 34
ID	LPIO22191
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 34
ID	LPIO22236
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 34
ID	LP1022430
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 significant reduction 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

	<p>making early release of Green Belt based on dubious house-building growth projections.</p> <ul style="list-style-type: none"> 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. <p>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</p>
Include files	
Number	Question 34
ID	LPIO22460
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>Harrow Estates plc agrees that housing targets of 430 and 476 dpa should be rejected for clearly failing to meet the FOAN for the borough. A plan based on those requirements would not meet the tests of soundness set out in the NPPF and be contrary to the Government's strongly stated objective to 'boost significantly' housing land supply.</p> <p>A Local Needs Assessment prepared by Turley Economics, and submitted with these representations, indicates that a figure in excess of 1,100 dpa may be required once the latest household projection data is taken into account. Harrow Estates reserves its right to comment further on the housing requirement once updated information becomes available.</p> <p>In the circumstances, we do not agree that option c should be outright dismissed at this early stage of the plan-making process. The Council will need to remain flexible to respond to any implications of the revisions to the NPPF, the final version of the Government's proposed standard method for calculating housing need and associated with this future iteration of the DCLG Sub-National Household Projections (SNHP) which could feasibly result in a level of need which is higher than 1,100 dpa.</p>
Include files	
Number	Question 34
ID	LPIO22515

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"> • Urban Capacity' option should not have been rejected, • 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 34
ID	LPIO22565
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 Q 16. The retention of a target build rate of c. 430 pa should be considered given the infrastructure constraints.</p>
Include files	
Number	Question 34
ID	LPIO22586
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	Yes
Your response - Please add your response here	<p>We agree with the Council that it is no longer appropriate to continuing the current housing target (430 homes a year) as this would fall well short of meeting housing need. We also agree that the 'Urban Capacity' option, which proposes no new greenfield sites apart from existing proposals (476 homes year), would also fall well short of meeting housing needs and would not comply with the NPPF (the NPPF does not seek to block development on greenfield sites which can provide a valuable source of housing).</p> <p>We would usually seek that a level of housing growth above the objectively assessed need be tested, on the basis that the NPPF does not seek to cap the delivery of housing and there is an overall need for new homes across the South East of England. However, in this instance we do not consider that it would be appropriate to pursue a level of growth that is significantly above the upper Government figure (1,100 homes a year). The proposed Government figure is already 2.5 times higher than the Adopted Core Strategy which seeks an average of 430 net additional dwellings per year and we do not consider that a significant increase above this would be deliverable over the plan period.</p>
Include files	
Number	Question 34
ID	LPIO22635
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 Q 16. The retention of a target build rate of c. 430 pa should be considered given the infrastructure constraints.</p>

Include files	
Number	Question 34
ID	LPIO22652
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 34
ID	LPIO22712
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 34 – Do you agree with the rejection of the following growth levels: (1) Continuing the current housing target (430 homes / year); (2) “Urban Capacity” option (476 homes / year); (3) Significantly above the upper Government figure (1,100+ homes / year)?</i> No comment
Include files	
Number	Question 34
ID	LPIO22820
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 work is needed to ensure development yield from brownfield urban sites is maximised. Sites identified through the preparation of a Brownfield Register, which is required to be in place by Christmas 17, will contribute to the reduction in the need to use Green Belt land.
Include files	