

Dacorum Borough Council Local Plan
Consultation on Emerging Growth Strategy 2020-2038

20th January 2021

CPRE HERTFORDSHIRE KEY CONCERNS:

1. Impact on Green Belt, the Chilterns Area of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC)

85% of Dacorum is rural, 60% is Green Belt, and 33% of the countryside is within the Chilterns Area of Outstanding Natural Beauty. Although the Council states that a key objective is "minimising and managing the requirement for development on Green Belt land and the impact on the Chilterns AONB", it is clear that in their declared mission to provide at least 100% of their self-assessed housing need, regardless of the impact on the environment, infrastructure, climate change and biodiversity (including that of the hugely important Chilterns Beechwoods SAC), will cause significant harm to the Green Belt and AONB. It also jeopardises plans, currently under early stages of discussion, to potentially extend the AONB or upgrade its status to that of a National Park.

2. Overprovision of housing

Whilst accepting that there is an undeniable need for more housing, in particular for more genuinely affordable housing, CPRE Hertfordshire has serious concerns regarding the sheer scale of proposed development. In our view, the Council has failed to take account of National Planning Policy Framework (NPPF), paragraph 11, footnote 6 which allows local authorities to restrict the scale of development due to other planning constraints including impacts on the Green Belt and AONB.

We also acknowledge that recent Government guidance on calculating housing need has been, at best, confusing. CPRE has been campaigning locally and nationally against the nonsensical algorithm method for calculating housing need. We firmly believe that housing need should be based on the most recent and relevant data, which is currently the 2018 based Office for National Statistics (ONS) projections. The Council has based its calculations on the outdated 2014 data which, in our opinion, would result in a significant overestimate of housing and brings into question the soundness of any local plan based on them.

3. Failure to address climate emergency issues

CPRE believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. Dacorum Borough Council declared a climate emergency more than a year ago. Despite this and some well-intentioned promises, the Strategy as published clearly prioritises economic growth and greenfield land development over considerations for the climate emergency. In so doing, it has failed to take account of legislation and recommendations from various UK bodies on how carbon reduction plans have to be integral to the development of local plans. Words of 'encouragement' are insufficient and no substitute for detailed carbon budgets and committed targets of local carbon reductions. This is a requirement of the National Planning Policy Framework (NPPF) and the 2004 Planning & Compulsory Purchase Act. A carbon reduction plan or pathway is required to meet the current national climate obligations of net zero by 2050 and this work should underpin a revised land use and development strategy.

4. Impact on infrastructure

The proposed level of development in Dacorum, along with potential development in neighbouring St Albans City and District, Three Rivers District and in Buckinghamshire east of Aylesbury, would place

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an unacceptable burden on all types of infrastructure services and facilities in Dacorum. The plan as proposed does little to address the improvements in infrastructure required to support the proposed increase in housing. We have particular concerns regarding the impact on water supply and waste water disposal.

5. Water supply and waste water disposal

The level of new housing proposed is expected to put severe strains on water supplies to Dacorum during the 2020s under drought conditions. In these circumstances there would be no option but to extract additional water from the chalk aquifer which in turn would cause further damage to the Borough's precious chalk streams. New supplies of water are not likely to be possible until after 2030. The growth proposed by the Strategy would require substantial infrastructure improvements in order to transport and treat wastewater and sewage. This might take at least ten years to complete, and be extremely expensive as well as disruptive to affected communities.

6. Underestimating potential brownfield regeneration opportunities

The Strategy fails to take into account the combined impacts of the coronavirus pandemic and recently expanded permitted development rights, both of which create many more opportunities for conversion of commercial space (especially office and retail) to residential use, and thus windfall provision of housing throughout the Borough is likely to be much higher than estimated. A more positive place making strategy is needed as part of a formal brownfield land review to realise local enhancement of the existing built environment with benefits for existing residents. This will ensure much greater emphasis should be given to regeneration of previously developed land in order to reduce the amount of housing and employment development on Green Belt and other greenfield sites outside of existing towns and villages.

7. Over-reliance on aspirational growth strategies and partnerships which have not been subject to public consultation and scrutiny.

The Emerging Strategy for Growth appears to be based on selective strategy documents* that have no formal planning status and which have not been widely consulted on. As a result, the Strategy has failed to take account of a number of important issues - the climate emergency, the environmental impact of the proposed development, and the prioritisation of 'brownfield' sites to meet housing needs. The pursuit of economic growth as promoted by the Hertfordshire Local Enterprise Partnership and implied by background work for a South West Herts Joint Strategic Plan, should be balanced against environmental concerns and climate obligations before they are tested through the local plan process.

*Dacorum Growth & Infrastructure Strategy to 2050, Dacorum Corporate Plan 2020-2025 and Corporate Action Plan

8. Implications of withdrawal of St Albans Submission Local Plan

The Strategy assumes that large areas of Green Belt land east of Hemel Hempstead and in St Albans District will be allocated for residential and employment development as part of the Hemel Garden Communities project. The St Albans Submission Local Plan has recently been withdrawn from Examination as the Inspectors advised that it would not be found 'sound'. The proposed sites north of Hemel Hempstead (5,500dw) in Dacorum must be called into question if there is any doubt about the future viability of the Garden Communities project as a whole.