



# Dacorum Local Plan Emerging Strategy for Growth 2020-2038



## Consultation Comments form

**Please return to Dacorum Borough Council, by 23:59 Sunday 7<sup>th</sup> February 2021  
Comments received after this time will not be considered.**

**By online consultation portal:** if you have internet access, it is recommended that you make your representations online at:

<https://consult.dacorum.gov.uk/kse/event/35755>

**Alternatively you can respond by:** saving and completing this form and returning by

**Emailing this form to:** [responses@dacorum.gov.uk](mailto:responses@dacorum.gov.uk)

**or posting this form to:** Strategic Planning and Regeneration, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Herts HP1 1DN

If you have any queries, please contact the Strategic Planning Team on 01442 228660.

**This questionnaire needs to be read in conjunction with the Local Plan Emerging Strategy for Growth 2020-2038 consultation documents.**

**You do not need to answer every question - just those that are relevant to you or that you have a view on.**

### Personal Details

Please note that \* denotes mandatory fields

Individual's Personal Details		Agent's Details (if applicable)	
Title	Mr		
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*(This is the Council's preferred method of contact)*

**Please note:** Your name and comments will be made available for public inspection (your address, telephone number and email address will **not** be made public) and therefore cannot be treated as confidential. **Your name and address must be completed for your comments to be considered.**

Please indicate if you wish to be notified of future Local Plan and Planning Policy Documents consultations.

**YES** I would like to receive future notifications

~~**NO** please do not send future notifications~~

**Signed** *John Saner*

**Date** 4.2.21

## Vision and Strategic Objectives

**Question 1: Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough?**

*(please select one answer)*

Yes ..... No NO .....

Please provide your comments on the Vision and Strategic Objectives.

*(Please add extra pages if required)*

In our view Central Government's demand for 17,000 new homes in Dacorum is based on housing estimates which have been shown by the ONS to be a significant over-estimate probably by a factor of 2. Furthermore, since the estimates were originally produced, no account has been taken of the changes to employment, shopping and living patterns which will almost certainly arise from or be accelerated by the pandemic, and which will result in more currently commercial and retail space becoming available for repurposing as residential.

In trying to comply with Central Government's demands, the plan places too much emphasis on development on Green Belt land, rather than maximising the use of brownfield sites. Of the proposed new housing, 60% is proposed on green belt land involving the loss of about 850 hectares of green belt. This is inappropriate in Dacorum, situated as it is, close to and partly in the Chilterns AONB

If the housing projections are almost double current ONS estimates and more commercial and retail buildings become available for alternative use because of pandemic accelerated change, there will be scope for more development on brownfield sites and less need for building on the Green Belt.

## The Sustainable Development Strategy

### Question 2: Do you have specific comments about the Sustainable Development Strategy?

*(please select one answer)*

Yes  ..... No  .....

Please provide your comments below and attach any supporting evidence.

**(Please note you will be able to comment on individual sites in Question 5: Proposals and Sites)**

*Please indicate clearly which part of the **Sustainable Development Strategy** you are commenting on (please add extra pages if required)*

The driver for growth envisaged in the plan is the requirement to provide more housing. It is assumed that with more people there will be more employment. This does not necessarily follow. In fact the driver for growth is more likely to be employment-led not the arbitrary decision to build more houses.

Employment patterns are bound to change following the pandemic and the demonstration that remote working for at least part of the time is feasible and desirable. The consequence of this is likely to be that if people can work remotely they will not need to live in expensive areas near to London and may move to cheaper areas. Hence the demand for extra housing may not materialise or may not do so to the extent envisaged.

If population growth is not as great as envisaged it follows that the demand for retail space will not be so great. This coupled with the acceleration of the trend to online shopping may lead to a reduction of demand for retail space.

The pandemic will lead to changes we cannot envisage. The most sustainable development for the foreseeable future will be based on flexibility and the adaptation of the current building stock, particularly current retail and office premises, to residential.

## Guiding Development

**Question 3: Do you have specific comments about any of the Guiding Development policies?**

*(please select one answer)*

Yes *yes* ..... No .....

Please provide your comments below and attach any supporting evidence.

*Please indicate clearly which of the **Guiding Development policies** you are commenting on (please add extra pages if required)*

Housing delivery

The change in employment patterns and reduction in demand for office space caused by the pandemic, will allow use of brownfield sites to be redeveloped and for commercial buildings to be converted to residential use. It appears that not enough weight has been given in the plan to develop brownfield sites and too much to developing greenfield sites in the green belt. The projected numbers of new houses is too high for the rural nature of Dacorum and its proximity to the Chilterns AONB.

## The Delivery Strategies

**Question 4: Do you have specific comments about any of the Delivery Strategies?**

*(please select one answer)*

Yes  ..... No  .....

Please provide your comments below and attach any supporting evidence.

**(Please note - you will be able to comment on individual sites in Question 5: Proposals and Sites)**

*Please indicate clearly which of the **Delivery Strategies** you are commenting on (please add extra pages if required)*

The delivery strategies for development are based on a flawed and out of date vision and as a result , we believe they will not deliver the perceived benefits.

## Proposals and Sites

### Question 5: Do you have specific comments about any of the Proposals and Sites?

(please select one answer)

Yes  ..... No  .....

Please provide your comments below and attach any supporting evidence.

Please clearly indicate which of the **Proposals and Sites** you are commenting on (please add extra pages if required)

Hemel Garden Communities

1 The development to the north of Hemel is based on a falsely perceived need to develop a large area of green belt

2 The proposal includes a plan to build a new road from the junction of the M1 at junction 8 to the Hemel/Leighton Buzzard Road (B440). It is not clear where the junction with the B440 will be. The maps suggest somewhere between Hilliers Garden Centre and Water End. If it is south of Water End, the bridge at Water End can hardly sustain any more traffic and has a weight restriction on it. If the aim is for the traffic to go to Berkhamsted via Potten End or to Leighton Buzzard via the B440, both these possibilities would lead to unsustainable additional traffic pressure. If the proposal envisages a bypass of Water End, that will involve the additional land acquisition not provided for in these proposals and the destruction of an historic landscape. For traffic travelling north, the obvious route to avoid the bottleneck at Water End is to go via Nettleden and Little Gaddesden which would cause unsustainable disruption to these villages

The B440 is not now a trunk road and there are several villages north of Water End which could not sustain the significant additional traffic that any new link road to the M1 would involve.

3 If the new road is not intended to be a link with the M1 but is intended to be an internal road servicing the new Hemel Garden Community, there will still be significant additional traffic generated on the B440, which will still have the effects outlined in 2 above

**Proposals and Sites**

**Question 5A: Are there any other sites that you think should be included in the Plan?**

*(please select one answer)*

Yes ..... No **NO** .....

Please tell us about any other sites that you think should be included in the Plan and explain why.

*If you are suggesting other sites to be included in the Plan please provide a **RED LINE BOUNDARY MAP** of the site along with any other supporting evidence*

## Sustainability Appraisal

**Question 6: Do you have any comments on the Sustainability Appraisal that accompanies the Plan?**

*(please select one answer)*

Yes *yes* ..... No .....

Please provide your comments on the Sustainability Appraisal and attach any supporting evidence.

*Please indicate clearly which part of the **Sustainability Appraisal** you are commenting on (please add extra pages if required)*

The proposed development will put pressure on the water supply. The water supply in the Chilterns is fragile and any additional need to pump water from the chalk aquifer will have a deleterious effect on the Rivers Gade and Bulbourne.

The inevitable increase in traffic arising from such large scale development will put huge pressure on already full roads. The proposed new road north of Hemel could have adverse unforeseen consequences on villages to the north and west of Hemel.

## Evidence Base

**Question 7: Do you agree that the Evidence Base that accompanies the Plan is adequate, up-to-date and relevant?**

*(please select one answer)*

Yes ..... No No .....

Please provide your comments on the Evidence Base and attach any supporting information.

*Please indicate clearly which part of the **Evidence Base** you are commenting on (please add extra pages if required)*

For reasons already stated elsewhere in this submission, we believe the assumptions on which the proposals are based are flawed

**National Policy and Guidance**

**Question 8: Do you think the Plan is consistent with the National Planning Policy Framework (NPPF) and supporting guidance?**

*(please select one answer)*

Yes ..... No .....

Please provide your comments on the Plan's consistency with the National Policy Framework (NPPF) and supporting guidance.

*(Please add extra pages if required)*



## Any other comments on the Emerging Strategy for Growth

### Question 9: Do you have any other comments on the Plan?

*(please select one answer)*

Yes ..... No .....

Please provide any other comments on the Plan and attach any supporting evidence.

*(Please add extra pages if required)*