



Dacorum's New Local Plan: Issues and Options Consultation

Comments Form



Please return to Dacorum Borough Council, by midnight on Wednesday 13th December 2017. 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://dacorum-consult.objective.co.uk/portal/planning/lp/io/io>

Alternatively you can respond by:

e-mail to: strategic.planning@dacorum.gov.uk

post to: Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire. 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 relevant sections of the Local Plan Issues and Options consultation document.

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

Individuals Personal Details		Agent's Details (if applicable)	
Title			
Name*	Steve Baker		
Organisation	CPRE Hertfordshire		
Address *	31a Church Street Welwyn Herts		
Post Code *	AL6 9LW		
Telephone No.	01438 717587		
E-mail	office@cpreherts.org.uk		

(This is the Council's preferred method of contact)

Please note: Your comments and personal details will be available for public inspection (apart from telephone numbers, email addresses and signatures) and therefore cannot be treated as confidential. **Your name and address must be completed for your comments(s) to be considered.**

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 1 Do you agree with the conclusions reached in the Sustainability Appraisal Working Note that accompanies this Issues and Options document?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

There are arguments put forward in the SA note that development in the Green Belt could offer benefits. An example of this (page 23 of the note) is where the scale of development in the Green Belt around the main settlements e.g. Hemel Hempstead, if sufficiently large, could “provide opportunities for the provision of Suitable Alternative Natural Greenspace (SANGs).”

National guidance on taking land out of the Green Belt for development does not include balancing the costs and benefits. Current National Policy means applying NPPF paragraph 14. The new Local Plan will have to demonstrate that there are exceptional circumstances, in order to change Green Belt boundaries to accommodate new development and provide SANGs.

We suggest that the retention of the Green Belt could have been included in the considerations of SA 11 Sustainable Locations in order to assess the impact of loss of green belt in the various options proposed. In this way, it would also have been possible to gain some idea of the cumulative affect of the loss of Green Belt across the various options.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 3 Have we taken account of all relevant studies and reports as part of our Issues and Options work?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

We recommend you read and reference the series of short articles by Ian Mulheirn of Oxford Economics on the national housing shortage and its relevance to areas of high housing demand such as London and the south east of England, in particular [Part 1 Is there really a housing shortage?](#)

A key conclusion from the facts in those articles and from the Redfern Review that Oxford Economics reported to, is that building more houses on the scale identified by the Council will have no impact on affordability, or access to housing by households that the Council wishes to help. House-building on the scale of all three options being considered would have only one major impact - the loss forever of large areas of Green Belt countryside, with the associated greater demand on infrastructure and services.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 4 Do you agree with the suggested vision for the Borough?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓ (qualified)	No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

The new vision for Dacorum 2036 is supported, including that “Local housing needs have been met, with the impact on the countryside minimised through making effective use of previously developed land in the towns and villages”, provided this is compatible with national policy for protection of the Green Belt. However, we do not see how the options for growth and the level of growth proposed in the Issues and Options document can possibly achieve this vision.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 6 Do you agree with the suggested objectives for the new Local Plan?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

There is no explicit sustainable objective of minimising the impact on the countryside, most of which is Green Belt. The restriction on development in the Green Belt, except in exceptional circumstances is not stressed enough. It is Green Belt that allows the Borough's settlements and countryside to retain their individual and special character in the face of pressure for development.

In order to be able to achieve the vision of minimising the impact on the countryside, an additional Sustainable Development Objective should be added as follows:

- To minimise the impact of development on the countryside and retain the existing Green Belt boundary unless exceptional circumstances justify its amendment.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 8 Do you agree with the proposed broad approach to distributing new development?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

Although we agree with the use of a Settlement Hierarchy as set out in the Core Strategy, which focuses development on the main towns and larger villages, new development should be directed to sites within those towns and villages and not in the Green Belt, or to areas beyond the Green Belt. The extensions of the boundaries of the towns and villages should only occur in exceptional circumstances as required in National Policy. Only with this caveat can the new Local Plan “minimise the impacts on the Green Belt” as stated in paragraph 5.1.2 of the Issues and Options document.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 9 Do you agree with the proposed approach to Green Belt and Major Developed Sites summarised above?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

Minimising the loss of Green Belt land to development must be a priority for the new Local Plan because this is a national Planning policy priority as restated recently by the Government. The proposed approach to Green Belt set out in paragraph 5.2.2 of the document, tries to balance the two conflicting requirements; of planning for enough sustainable development to meet the future needs of Dacorum; and protecting the Green Belt from most types of development. This is incorrect because housing need alone is not an “exceptional circumstance” which would justify loss of Green Belt Land.

Paragraph 5.2.7 of the Issues and Options document sets out the checklist from the Housing White Paper. CPRE strongly promotes the first stated bullet point of making best use of brownfield sites and welcomes the Council’s commitment to preparing a Brownfield Land Register. However, as stated in a recent article in [The Planner 12/12/17](#) CPRE is concerned that brownfield land registers are failing to record small plots of land and that a full range of sites should be identified in towns and villages.

A Neighbourhood Plan process can assist with the identification of small sites, especially in villages. All Neighbourhood Planning Bodies should be encouraged by the Borough Council to contribute to the Brownfield Land Register.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 11 Do you agree with the proposed approach to selecting sites? Yes / No
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

The overriding emphasis in the consultation is on the development of greenfield sites in the Green Belt to meet one of the growth options. Paragraph 5.4.13 states that “brownfield sites are a finite resource” and that the Council will need to rely more on greenfield opportunities in the future”. Green field sites are also a finite resource. Once developed green fields are lost forever whereas brownfield sites can be developed and re-developed in the future.

In addition, simply adding sites to a brownfield register is not an active way of considering options for housing development. Only one brownfield regeneration site, in Hemel Hempstead, is mentioned in the consultation document. Although on page 35 there is a link to a ‘Call for Sites’ form, CPRE Herts encourages the Council to promote this call for brownfield sites as fully as possible.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	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?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	✓
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Comments

Whilst the outcome of the consultation on the right approach to calculating housing need is pending, it is not possible to support or reject any one housing target. However, the new methodology will still only be the starting point in deciding on a housing target, as the latter has to take into account constraints such as those set out in the NPPF, and can be lower than the housing need calculation, which itself will be based on projections that by definition do not take planning policy into account.

In setting a housing target, the Council must analyse the components of housing need to identify the numbers of those households whose need for a home in the Borough is acute or intense enough to justify removal of land from the Green Belt to house them, i.e. represents exceptional circumstances.

Dacorum should not be considering accommodating housing need for London, which should be considered first on brownfield land in London. Housing need for Dacorum should be met within the towns and villages with Green Belt around them, in Dacorum on other brownfield land, or to areas beyond the Green Belt.

Whatever figures is used as a starting point, it is most important that all the constraints on providing for housing need are properly assessed, including safeguarding the Green Belt as the primary consideration. Only development, which is justified by exceptional circumstances, should be provided for in the Local Plan through the removal of land from the Green Belt.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 17 Do you agree with the proposed approach to affordable housing?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

In paragraph 6.3.10 of the Issues and Options document it states that increasing the overall supply of new housing will help boost the supply of affordable homes. The higher provision of 40% affordable housing on large greenfield sites seems to conflict with the supposition in paragraph 6.3.5 that brownfield sites are more likely to provide smaller sized homes which are the size predominantly required for affordable homes.

Boosting affordable housing by increasing the overall supply of housing is a largely ineffective in meeting need. The national 'housing crisis' is not a simple 'numbers' problem but a problem of ensuring existing and new housing is provided for those households who need them rather than just those who can afford them in an open housing market. New housing developments in Dacorum will be acquired in a very competitive market for an investment or second home as well as homes to live in. This competitive market reduces the likelihood of those who really need the new homes being able to afford them. We refer you to Ian Mulheirn's articles on housing prices and whether building more houses will bring house prices down [Part 2 Are housing costs high?](#) and [Part 3 Why are prices so high and will building more bring them down?](#). These articles illuminate the national housing shortage and its relevance to areas of high housing demand such as London and the south east of England.

Measures to encourage and promote the direct provision of social and affordable housing should be pursued, rather than simply relying on a small percentage of dwellings in large developments. The Council's own house-building programme is one such method but other direct provision including community housing should be supported.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 19 Do you agree with the proposed suggested approach to the timing of site delivery?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes	✓ (qualified)	No	

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Council should continue to exert control over timing of site delivery to give priority to brownfield sites. The release of Green Belt sites may well have a greater demand for new infrastructure and services than brownfield sites and should be avoided other than in exceptional circumstances.</p> <p>We agree with other objectors that paragraph 6.4.4 of the Issues and Options document states the fact that Green Belt sites can be delivered early. Developers would always prefer to develop green field sites first and it is not the suitability of these sites that needs to be tested, it is the exceptional circumstances that would justify a green belt release that must be proven.</p> <p style="text-align: right;"><i>(Please continue of another sheet of paper if required)</i></p>

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 21 Do you agree with the proposed approach to meeting future jobs growth?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

No, the approach to meeting future jobs growth needs to consider the availability of land on which these jobs can be provided. In particular, the constraints imposed by the location of Dacorum in the London Green Belt. Following current National Policy means applying NPPF paragraph 14 and the new Local Plan will have to demonstrate that there are exceptional circumstances, not just to justify housing need, if Green Belt boundaries are to be changed to accommodate new development. The number of jobs that are needed and can be justified will depend on the assessed need and a target set in the light of NPPF paragraph 14 and the constraints imposed by national Green Belt policy.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 22 Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

The proposed locational approach to providing for future jobs growth includes the allocation of three sites in the Green Belt: South west of Kings Langley for office development (as a reserve if insufficient new offices space is built at the Green Lane site at Hemel Hempstead); and east of the A41 at Two Waters and Dunsley Farm in Tring for industrial and warehousing. The Council considers that the need for additional employment land justifies the loss of Green Belt. The need for jobs is not an “exceptional circumstance” to justify using Green Belt land for employment use.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

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.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	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).
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

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.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 35 Has the Council considered all reasonable alternative levels of growth?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

The Council needs to consider the capacity of the Borough to provide for growth as the starting point. However, it is not possible to provide any further comment pending the issuing of new National Planning Practice Guidance on this matter.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 36 Do you support the proposed locational principles?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

The Council’s proposed ‘Locational Principles’ are listed in paragraph 10.2.4. One of the most important locational principles is missing. The last (or even the first) of these principles should be ‘Develop Green Belt land only for appropriate uses or where “exceptional circumstances” permit it.’

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 37 Do you agree with the rejection of the following growth distributions: a) New settlement (town or village); b) Rural growth; c) Export growth to another Council area; d) Use greenfield land before brownfield land; and e) Significant expansion of a large village(s)

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes	✓(a,b,d,e)	No	✓(c)

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>Rather than using the words in c) "Export growth", the Council should take into account all national constraints on meeting the needs of the Borough to grow such as the Chilterns Area of Outstanding Natural Beauty and Green Belt and consider that these needs may have to be met elsewhere.</p> <p>Bullet c) should be removed from the list of rejected options for growth distribution, re-worded and included in the list of locational principles in paragraph 10.2.4.</p> <p style="text-align: right;"><i>(Please continue of another sheet of paper if required)</i></p>

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 38 Has the Council considered all reasonable alternatives for distributing growth?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

It is abundantly clear that the approach to distributing growth has been skewed by the availability and promotion of green field sites by developers. As mentioned in other responses to this consultation by CPRE Herts, the key to distributing growth throughout Dacorum should concentrate on land and buildings within settlements that can be developed or redeveloped without the release of Green Belt land in accordance with the NPPF and within other planning constraints. The regeneration of previously developed land should be the first consideration for distributing growth.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 46 Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

CPRE Herts has not commented on individual site appraisals at this stage of the new Local Plan consultation.

(Please continue of another sheet of paper if required)