

[This email is being sent to all Dacorum Borough Councillors and Hertfordshire County Councillors representing wards in Dacorum](#)

Dear Borough and County Councillors,

Key points from CPRE Hertfordshire’s review of the Dacorum Borough Council proposed Local Plan “Emerging Strategy for Growth 2020 – 2038”

I am writing to you in response to Dacorum Borough Council’s recently proposed Emerging Strategy for Growth 2020 - 2028. CPRE Hertfordshire have a number of concerns with the strategy as published and these are summarised below. We have also included an outline framework (“*Vision for planning*”) that we would like to see used as the basis for developing the Local Plan.

We would like to request that you take up our concerns with your colleagues and Dacorum planning officers and request that the strategy is revised to ensure that, 1) it implements existing legal commitments related to environmental protection and addressing climate change and, 2) is developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the strategy.

Why is this important? CPRE Hertfordshire believes that planning is crucial to empowering local communities and making sustainable, liveable places.

It is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily. More new homes are undeniably needed and there is plenty of scope to use previously developed urban land (i.e., “brownfield”) to help address this need.

Our primary concerns with the proposed strategy are;

- **Unnecessary impact on the countryside** - The proposed strategy will destroy over 850 hectares (1,214 football pitches) of countryside and green spaces and have a dramatic and unnecessary impact on Green Belt. The consequences of the over-development proposed in the strategy is contrary to national policy, the Strategy’s own policies, and both the Chilterns Conservation Board (CCB) Management Plan 2019-24 and its Position Statement Development Affecting the Setting of the Chilterns AONB 2011, revised 2014.
- **Over provision of housing** - The proposed level of housing is based on outdated 2014 population and housing data and overstates the housing need by c. 50%, when compared to using more recent 2018 data. The proposed strategy prioritises meeting an excessive level of housing need over protection of the Green Belt on the assumption that this is required by national policy. This assumption is incorrect. Exceptional circumstances for meeting housing need in full have not been demonstrated in the consultation documents.
- **Failure to address climate emergency issues** - The strategy fails to demonstrate a pathway to local carbon reductions. This is a requirement of the National Planning Policy Framework and the 2004 Planning and Compulsory Purchase Act. An evidence-based carbon reduction plan is also required to meet the national climate obligations of net zero by 2050.
- **Impact on infrastructure** – of the proposed strategy and those elsewhere in Hertfordshire and in neighbouring Buckinghamshire have not been fully considered.

- **Water supply and wastewater disposal** – the strategy is largely silent on new sources of water required to meet the demand from the proposed new developments and on the significant investment required to move and treat wastewater.
- **Underestimating brownfield regeneration opportunities** – that will arise from more office / retail / commercial space being available for residential conversions in the wake of the pandemic. The strategy also needs to consider ‘windfall’ housing completions that will occur from recently expanded permitted development rights.
- **Over-reliance on aspirational growth strategies and partnerships which have not been subject to public consultation and scrutiny** – the strategy is based on selective strategy documents that have no formal planning status. As a result, the strategy does not adequately address important issues such as the climate emergency, environmental impact and the prioritization of brownfield sites to meet local housing need.

Want to understand more? - Attached to this email are two documents that we have shared with our members, Parish and Town Councillors and local groups. These documents are designed to help them develop their own response to the proposed strategy. They are also available on our [website](#).

1. **CPRE Herts review of DBC Local Plan**” this discusses in detail our 8 major concerns.
2. **“CPRE Herts impact assessment”** this is our site-by-site analysis of likely impact on the countryside. Interestingly the published documents on the Dacorum BC website do not contain a similar aggregated analysis.

What should we do differently? - Dacorum Borough Council should develop a Local Plan based on the principles set out in the recently published “Vision for Planning”.

In response to the government’s recent Planning White Paper, CPRE in collaboration with 18 national organisations have presented to the government a **“Vision for Planning”** This sets out key principals that should be at the heart of a new planning system.

- **Has sustainable development at its heart.** This means developing a local plan using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at its centre.
- **Both protects and enhances local green spaces and heritage for the benefit of people and nature** – This means identifying and enhancing natural spaces close to people’s homes.
- **Tackle the biodiversity crisis** This means better protecting species and our most important habitats and enhancing biodiversity by strategically planning for ‘nature recovery areas’.
- **Help tackle the climate emergency** This means ensuring all new homes are built to zero carbon standards as soon as possible, encouraging the use and repair of existing buildings and rapidly decarbonising transport.
- **Deliver enough quality affordable and social homes for purchase and rent to meet local needs.** This means moving beyond the current mechanisms to ensure the right amount of affordable and social homes in accessible urban locations.

- **Make best use of previously built on land to maintain our green spaces and reduce dependency on cars.** This means reviewing the opportunity for redevelopment of urban land and consider mixed use living in and around town centres.
- **Encourage green and sustainable forms of transport** This means redeveloping our urban areas to realise more vibrant mixed use town centres and encourage shifts towards walking, cycling and green public transport as the main forms of transport.
- **Be evidence-based** This means using the latest accurate data including meeting community needs and assessing environmental impact to underpin plans and decisions in line with agreed international commitments.
- **Ensure beautiful, quality places that are in keeping with local character** This means promoting good, holistic, sustainable design and revoking permitted development rights that have led to poor quality conversions to housing.

We hope that you have found this information useful and will join us in our call for a new approach to developing the Dacorum Local Plan and to ensure it meets its legal commitments in full.

Please feel free to contact us at office@cpreherts.org.uk if you would like more information or to discuss this in more detail.

Yours sincerely,



Richard Bullen
Honorary Chairman
CPRE Hertfordshire



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