



The countryside charity  
Hertfordshire

31a Church Street  
Welwyn  
HERTS AL6 9LW  
[www.cpreherts.org.uk](http://www.cpreherts.org.uk)  
[office@cpreherts.org.uk](mailto:office@cpreherts.org.uk)  
01438 717587

**Standing up for Hertfordshire's countryside**

Our Ref:

Your Ref:

Dacorum Borough Council: draft Local Plan – Emerging Strategy for Growth

I am writing to provide some details of our concerns about the draft Local Plan, our reasons for these concerns and a request that you do all that you can to influence the Borough Council to make changes to their proposals.

Our concerns centre on the number of houses in the plan and how this number has been derived, the amount of Green Belt and green space land that will be given up for these houses and the lack of an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan.

Our national charity, CPRE the Countryside Charity, together with a number of institutions that share our concerns about planning white paper very recently launched "Our Vision For Planning". This set out eleven points, of which the three that were focussed on by the CPRE speaker at the launch event were:

- Be democratic and place local communities at the centre
- Deliver enough quality affordable and social homes for rent to meet local needs
- Both protect and enhance local green space and heritage for the benefit of people and nature

There is a fourth that we consider is of the greatest importance:

- Be evidence-based

Our concerns bridge the four points mentioned above. We consider that the Borough Council (DBC) has failed to follow national planning policy and take constraints, such as the impact on the Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB), into account when proposing the number of houses that should be built.

Policy as set out in the National Planning Policy Framework (NPPF) allows for Local Authorities to not fully meet their house needs if other planning constraints such as impact on the Green Belt or AONB, mean they are not able to meet their targets.

**CPRE is working nationally and locally for a beautiful and living countryside**

**CPRE Hertfordshire is a Charitable Incorporated Organisation**

President: Sir Simon Bowes Lyon, KCVO  
Chairman: Richard Bullen

Registered Charity 1162419



We consider also that DBC draft Local Plan is based on selective strategy documents that have no formal planning status and which have not been widely consulted on. As a result, the plan has failed to take account of a number of important issues, the climate emergency, the environmental impact of the proposed development and the prioritization of brownfield sites to meet housing needs.

DBC has chosen to use outdated 2014 Office for National Statistics based housing projections in its determination of housing need. We consider that the more recent, 2018 ONS-based housing projections should be used. The National Planning Policy Framework states that all policies should be underpinned by relevant and up-to-date information. Using the 2018 data would result in housing requirements that is 53% less than currently proposed.

There is a good deal more in our concerns than I have set out in this letter. I would be pleased to go through these with you if you wish, perhaps in a video meeting in which I would include our planning manager, Chris Berry (he has succeeded Tim Hagyard).

I hope that, in view of our concerns, especially the threat to the Green Belt, you will do all that you can to influence the Borough Council to change course in its plan making.

With best wishes

Yours sincerely

Richard Bullen  
Honorary Chairman