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Standing up for Hertfordshire's countryside

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Our initial review - South West Hertfordshire Joint Strategic Plan 2050

We believe the proposed South West Hertfordshire Joint Strategic Plan is deeply flawed because...

- **Over-emphasis on growth, growth, growth.** The Joint Plan is founded on a presumption of growth with no evidence to support this. It should instead be based on the presumption of protecting and conserving our countryside, nature and the environment in perpetuity, as these are the positive attributes that enhance the quality of life for everyone throughout the area.
- **Insufficient focus on the Green Belt and the Chilterns Area of Outstanding Natural Beauty.** The Joint Plan makes no mention of the fact that the majority of the land in South West Hertfordshire is designated protected land, including the Chilterns Area of Outstanding Natural Beauty, the Green Belt, and the Chilterns Beechwoods Special Area of Conservation. The Joint Plan needs to prioritise the ongoing protection from development of these designated areas, consistent with oft-repeated government promises.
- **Insufficient focus on brownfield redevelopment.** The Joint Plan states as a sort of footnote that "we are required by government to ensure that we have maximised the use of land that has been previously built on ('brownfield' sites) before considering using any undeveloped land ('greenfield' sites)". The Plan needs to have a much stronger and proactive commitment to delivering all available brownfield redevelopment opportunities. This is not happening now, and identified brownfield sites have remained derelict for decades.
- **Silence on farming and agriculture.** The Joint Plan makes no mention of this. Instead, it should acknowledge the significant amount of productive farmland in South West Hertfordshire and should commit to protect and maintain this farmland for agricultural use and food production. This will help improve our domestic food security by reducing reliance on importing food from abroad, consistent with UK government strategy. It will also ensure farmland continues to act as a carbon sink to help mitigate climate change.
- **Insufficient focus on water resources.** The Joint Plan makes mention of water infrastructure (both clean water supply and waste water handling), but it ignores the need to quickly improve the local water infrastructure – currently Dacorum has more sewerage overflows than any other part of Hertfordshire. And there is no mention in the Joint Plan of the need to protect our rare and precious chalk streams and their wildlife habitats – The Chess, The Bulbourne, The Gade, The Ver, and The Colne – which are currently threatened by housing growth (growth in water usage) as well as hotter, dryer weather brought about by climate change.

- **Inadequate approach to low carbon transport.** The Joint Plan makes no mention of Luton Airport's damaging impact (noise and pollution) on much of Dacorum Borough and St Albans District and the need to mitigate these, and the need to oppose any further airport and air traffic expansion in keeping with the five local authorities' declaration of a climate emergency. There is insufficient mention of the need to dramatically expand the routes, frequency and reliability of bus services. There is insufficient attention to the need to improve and connect up existing cycleways and to create a more extensive network of these. There is no recognition of current levels of traffic congestion in our town centres, which growth proposals will make much worse. Cars still contribute to congestion even if they are electric.
- **Over-emphasis on the built environment.** The Joint Plan should instead focus on all aspects of the natural environment, including
 - **Community woodlands.** We think that the Plan should recognise and propose new support for the Watling Chase Community Forest, and propose a new large area of community woodland similar to the Woodland Trust's Heartwood. This would relieve visitor pressure on existing areas of valued biodiversity such as the Chilterns Beechwoods Special Area of Conservation, as well as make a meaningful contribution to improved biodiversity, climate change mitigation and public recreation.
 - **Local Green Spaces.** The Plan should ensure there are formally designated Local Green Spaces in every community, so that everyone in South West Hertfordshire, both urban and rural, has access to nature close to where they live.
 - **Public Rights of Way.** The Plan should prioritise the protection of the landscapes around our national and regional long distance footpaths including The Ridgeway, The Chilterns Way and The Hertfordshire Way. It should emphasise access to and protection of the entire network of Public Rights of Way (footpaths and bridleways) and their importance for recreation, health and well-being for everyone.
- **Warm buzzwords about climate change.** Because of all of the above flaws in the Joint Plan, the many warm words it contains on the need to mitigate climate change amount to just that, warm words, and carry little credibility. We believe nature-based and countryside-based solutions to climate change must be prioritised over all else, along with protecting the environment and the countryside. And by a wide margin the majority of the British public agree with this view.¹ As currently envisioned, the Joint Plan will instead prioritise economic growth over everything else, and Hertfordshire and the rest of the UK and the planet will continue to over-heat.

¹ In a poll commissioned by *The Economist* and conducted by Ipsos on 12-13 September 2022, "by 43% to 29%, respondents think more focus should be placed on environmental protection, "even if that harms economic growth". By a margin of 57% to 24%, our respondents favour giving priority to the views of local residents and protecting the countryside, even if that results in less new housing."