



**Dacorum Local Plan to 2041**  
Pre-Submission Stage Representation Form

**Ref:**  
  
**(For official use only)**

**Name of the Local Plan to which this representation relates:**

Dacorum Local Plan to 2041

Please return by **12pm (noon)** on **Tuesday 17 December 2024** to Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN or upload onto our consultation portal at [letstalk.dacorum.gov.uk/make-a-representation](http://letstalk.dacorum.gov.uk/make-a-representation)

This form has two parts –

**Part A** – Personal Details: need only be completed once.

**Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	Mr	
First Name	Chris	
Last Name	Berry	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	CPRE Hertfordshire	
E-mail Address	planning@cprehertfordshire.org.uk	
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**6 x PART B representation forms follow.....**



**Dacorum Local Plan to 2041**  
Pre-Submission Stage  
Representation Form

**Ref:**  
  
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**Part B (1 of 6)**

Name or Organisation: **CPRE Hertfordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	1.1, 1.12, 1.28, 1.59 seq.	Policy		Policies Map	
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Inadequate consideration of Green Belt**

With 60% of the Dacorum Borough Council (DBC) area designated as London Metropolitan Green Belt, this is a principal land classification and inadequately considered in the Pre-Submission Local Plan (P-SLP). Whereas the Green Belt is introduced (together with the Chilterns National Landscape (CNL)) in paragraph 1.11 of the P-SLP, under the heading of the South West Herts Joint Strategic Plan, it is then that noted that: "The Joint Strategic Plan will be progressed further in the coming years" (para. 1.12); providing no indication of the priority to be accorded to this major element of the local planning authority area.

Reference is made to "protected landscapes" (paragraph 1.28) including the Chiltern National Landscape but the "Vision for Dacorum to 2041" omits specific mention of the Green Belt designation. This is regrettable given the high value placed on the protection of open countryside by local communities throughout the Borough.

The Vision for Dacorum notes “The natural beauty of the Chiltern Hills and the varied character of the countryside will be enhanced, and will continue to be admired and cherished”. This and subsequent statements of Strategic Objectives relating to the “Rest of the Borough” (para 1.59 seq) are unsound when the magnitude and allocation of proposed development by the Local Plan is considered. Protection and enhancement of the valued qualities of the countryside will be strongly and inevitably negatively influenced by the quantum of growth proposed and no policy indication is provided of the required changes to maintain protection and promote enhancement.

The Green Belt is a major characteristic element of the Borough area, with substantial impact on the distribution of land uses, activities and future development. The significance of the Green Belt is not sufficiently recognised in the P-SLP, specifically with regard to the policy constraints it imposes by virtue of the requirements of the National Planning Policy Framework (NPPF) paragraph 11d) and footnote 7.

The Green Belt is increasingly recognised as being critical to the amelioration of climate change impacts and the promotion of biodiversity, in addition to its landscape, heritage, health and aesthetic benefits. Accordingly, the Green Belt requires much fuller treatment in the P-SLP and indication of the analysis which has been undertaken with regard to the review of Green Belt quality and relevance which is presently lacking.

It is entirely inappropriate that the Green Belt is not identified on the map introducing Chapter 6: Natural Environment. It constitutes the most extensive land designation in the Borough with significant implications for development policy and proposals.

(Continue on a separate sheet /expand box if necessary)

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6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Appropriate treatment of the contribution of the Green Belt and robust analysis of its impacts on proposed development options throughout the Borough. Fuller consideration of the implications of statutorily designated protected land for site allocations.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To promote the significance of Green Belt and Chilterns National Landscape as major policy designations in the Borough and the inadequate consideration of its implications for site allocations. To promote appropriate consideration and treatment of the countryside as the major land use in the Borough.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



**Dacorum Local Plan to 2041**  
Pre-Submission Stage  
Representation Form

**Ref:**  
  
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**Part B (2 of 6)**

Name or Organisation: **CPRE Hertfordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	6.20 seq.	Policy	NE4, NE5 NE6	Policies Map	
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Inadequate consideration of SANG**

CPRE Hertfordshire supports the Chilterns Conservation Board and the Local Planning Authority in their concerns regarding the provision of Suitable Alternative Natural Greenspace (SANG) in response to the human impacts on the Chilterns Beechwoods Special Area of Conservation (CBSAC). "SANG Principles" are introduced in Chapter 6 Natural Environment of the P-SLP, together with the need to implement a Strategic Access Management and Monitoring Strategy (SAMMS) specifically for the Ashridge Estate.

Particular concerns relate to the provision of SANG which is introduced by Strategic Policy NE4 in the discussion of the implications of the need to mitigate the public impacts on the CBSAC, with significant implications for the maintenance of open countryside throughout Dacorum.

We note the identification of site allocations and Council owned land which may be available for SANG but are concerned at the lack of detail with regard to how this provision will be achieved.

Policy NE5 – SANG Principles, lists criteria gained from national Government guidelines but fails to elaborate these further in relation to conditions in the Borough, providing only guidelines for general application. It is also inconsistent with the CBSAC Mitigation Strategy, prepared by the Council, which sets a requirement for the location of SANG. The Mitigation Strategy specifies that SANG must have a catchment area of five kilometres or less, i.e. housing development must be within five kilometres of the associated SANG, and this is not specified within the Policy.

Further, Policy NE5 conflicts with Policy NE2 regarding biodiversity when it enables the provision of SANG which will have a detrimental impact on protected species and habitats, for example through permitting free-running dogs which will be injurious to endangered ground-nesting birds. This is a weakness of the SANG principles but in any case gives rise to unsound policies by reason of inconsistency.

Policy should ensure that each SANG site is fully and independently assessed, and that potential developers' assessments are robustly reviewed. Policy NE5 omits any mention of the effectiveness of SANG locations achieving their objectives, other than to a modest proportion of immediately adjacent residents.

Similarly, Policy NE6 – Gateway Principles, again states general criteria only and it is necessary to undertake a robust and holistic approach to SANG and Gateway provision, beyond the listing of potentially available Council owned and other land without any indication of the route towards implementation. Failure to do this leads to unsound policy.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is necessary to incorporate a more detailed consideration of the provision of SANG and SAMMS and their implications for the countryside in the Borough. The strategic approach required should include recognising the need to protect the countryside through including policies and proposals for the Green Belt, the Chilterns National Landscape (CNL) as well as SANG provision.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To promote the appropriate treatment of SANG through a holistic and robust approach which includes strategic and more detailed policies and proposals.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



**Dacorum Local Plan to 2041**  
Pre-Submission Stage  
Representation Form

**Ref:**  
  
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**Part B (3 of 6)**

Name or Organisation: **CPRE Hertfordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	TR03	Policy	[ ]	Policies Map	[ ]
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	[ ]	No	[ ]
4.(2) Sound	Yes	[ ]	No	X
4.(3) Complies with the Duty to co-operate	Yes	[ ]	No	[ ]

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Inappropriate allocation of Site TR03 East of Tring**

It is not appropriate to include the site allocation TR03 (Marshcroft) in the Pre-Submission Local Plan (P-SLP) following the recent planning appeal inquiry and the Secretary of State's decision. Very significant resources were directed relatively recently (Spring 2023) to a long and detailed inquiry which considered all aspects of the proposed development, resulting in the dismissal of the appeal.

It is entirely unreasonable now to suggest that exceptional circumstances, as required by the NPPF, exist to allocate this site in the P-SLP when local conditions affecting the site and area have not changed. This decision brings the planning system into disrepute and takes no account whatsoever of local community and policy concerns which were expressed at the planning inquiry.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have



identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of the TR03 site allocation from the P-SLP.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

No requirement to participate on this specific matter.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



**Dacorum Local Plan to 2041**  
Pre-Submission Stage  
Representation Form

**Ref:**  
  
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**Part B (4 of 6)**

Name or Organisation: **CPRE Hertfordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	11.1 seq.	Policy	ID1	Policies Map	
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Inadequate consideration of infrastructure**

CPRE Hertfordshire is deeply concerned about the deliverability of the Pre-Submission Local Plan (P-SLP) with regard to the extensive allocations of land without specification of the means of implementation and addressing the constraints relating to infrastructure. This affects all aspects of the P-SPL but particularly the large-scale proposals for the Hemel Garden Communities (HGC) and those affecting the countryside.

The magnitude of the HGC proposals, together with the remaining allocations, raise significant concerns regarding water supply and sewerage provision which are not being appropriately addressed. Statutory responsibilities need to be demonstrated as being implementable in response to the concerns of local communities with regard to existing shortfalls in provision, let alone additional pressures.

Key conclusions of the South West Herts Joint Strategic Plan (SWHJSP) Position Statement: South West Hertfordshire Water Infrastructure Needs (Feb 24) indicate a seriously complacent situation, especially in respect of the timing of the infrastructure required and its cost, and the

achievability of the required reduction in water consumption throughout the sub-region, including Dacorum. The Interim Sustainability Appraisal accompanying the P-SLP notes that Affinity Water has identified 'a significant supply/demand deficit' (paragraph 6.2.78) in its Central Region which includes Dacorum Borough. It fails to identify the timing of potential new water supply delivery into the Affinity supply area in Hertfordshire, which is likely to be critical.

Similar concerns relate to sewerage capacity and the damage being done to rivers across the County by prolonged raw sewage releases has reached crisis point. The Infrastructure Delivery Plan (IDP) that forms part of the P-SLP states clearly that "The Hertfordshire Water Study confirms that wastewater treatment capacity is available to support current growth levels in Hertfordshire to 2031. However, investment in capacity will be required to service growth beyond that period." (Page 82). Thames Water's issues are also well-known and existing sewerage infrastructure is inadequate to cope with current, let alone future population.

Unsupported statements in the SWHJSP Position Statement that Thames Water is able to provide do no more than reflect their statutory responsibility as noted above, but in the absence of detailed proposals do not provide any reassurance that water issues will not be a major constraint to development. Such undertakings as are expressed lack schedules and credibility.

The above issues also have very significant environmental impacts for water courses, particularly for the Rivers Bulborne, Gade and Ver which form crucial elements of the unique chalk stream ecology. Chalk streams and their habitats are of national and international importance and must be protected from further degradation caused by abstraction and pollution. Feasible solutions to these infrastructure concerns are entirely lacking and constitute a major omission from the P-SLP, affecting its soundness.

The treatment of implementation in Chapter 11 – Infrastructure Delivery and Monitoring comprises two policies containing statements of intent. Given the magnitude of development anticipated in the plan period, this is wholly inadequate to ensure the achievement of the Local Plan's objectives.

Policy ID1 – Delivering the Infrastructure to Support Growth, paragraph 4 notes: "where it can be demonstrated that the infrastructure requirements could render the development unviable, proposals for major development should be supported by ...viability assessment". This suggests that developers may continue to use viability assessments to gain consent without having to provide or fund the necessary infrastructure. This is unsound and means that development could proceed without the provision of necessary infrastructure.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put

forward your suggested revised wording of any policy or text. Please be as precise as possible.

Further indications of means of implementation for significant infrastructure in the light of uncertainty from statutory providers with regard to the magnitude and timings of necessary projects.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

CPRE Hertfordshire wishes to raise concerns about the lack of specific implementation targets, particularly with regard to crucial infrastructure provision to service existing and planned development.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



**Dacorum Local Plan to 2041**  
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**Ref:**  
  
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**Part B (5 of 6)**

Name or Organisation: **CPRE Hertfordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	<input style="width: 90%;" type="text"/>	Policy	<input style="width: 90%;" type="text" value="CC1, NE2, NE3, NE4"/>	Policies Map	<input style="width: 90%;" type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input style="width: 90%;" type="checkbox"/>	No	<input style="width: 90%;" type="checkbox"/>
4.(2) Sound	Yes	<input style="width: 90%;" type="checkbox"/>	No	<input checked="" style="width: 90%;" type="checkbox" value="X"/>
4.(3) Complies with the Duty to co-operate	Yes	<input style="width: 90%;" type="checkbox"/>	No	<input style="width: 90%;" type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Inadequate consideration of climate change amelioration and biodiversity enhancement**

In common with other Pre-Submission Local Plans in Hertfordshire and beyond, there is seriously insufficient consideration of issues relating to the amelioration of climate change impacts and the maintenance and enhancement of biodiversity. The P-SLP does not identify the positive roles of the countryside in this area, which has implications for the lack of policy and proposals promoting the significance of designated protected land, such as Green Belt, the Chilterns National Landscape and other designated areas as specified in the NPPF footnote 7(NPPF, page 6).

It is inappropriate and unsound to state: "Growth will help reduce the Borough's contribution to climate change through the location and design of development" (Chapter 1 The Vision for Dacorum to 2041) as the quantum of development proposed in the P-SLP renders that infeasible. Such generalised and unspecific statements lead to unsound and

irrelevant policies which do not respond appropriately to the scale and form of the challenges posed by climate change.

There will clearly be considerable impacts caused by the magnitude of development proposed in the P-SLP and spatial policy should respond specifically to these challenges, taking full advantage of the contribution of the countryside for carbon sequestration, rooftop energy generation and the promotion of sustainable agriculture. It is not sufficient to limit the treatment of this critical subject to bland statements of intent.

With regard to biodiversity, it is incumbent on Local Plans to identify and tackle the wholesale loss of biodiversity caused by large-scale development. Notwithstanding the introduction of biodiversity net gain requirement, practice in this area is patchy and wholly inadequate in most cases.

Local Plans have a crucial role to play in promoting sustainable development as part of the third “overarching objective” of the NPPF in “2. Achieving sustainable development” (NPPF, page 5). Whilst recognising “Protecting Biodiversity and Geodiversity” (Chapter 6, paragraphs 6.6 seq. and succeeding Policies NE2, NE3 and NE4) the limited nature of the treatment ignores the wider requirements and policy implications of biodiversity loss and the opportunities for net gain.

A critical issue for the P-SLP is the lack of knowledge and robust information regarding biodiversity on sites allocated for development. This is of course not a topic solely for Dacorum, but the richness of biodiversity on large sites cannot regularly be replicated and, particularly in the case of statutorily protected land, biodiversity net gain is not sufficient reason to justify the loss of unique and scarce habitats.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Significantly greater consideration of climate change amelioration and biodiversity issues which affect direct implications for planning policy

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To promote the appropriate treatment of climate change amelioration and biodiversity issues within the Local Plan

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



**Dacorum Local Plan to 2041**  
Pre-Submission Stage  
Representation Form

**Ref:**  
  
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**Part B (6 of 6)**

Name or Organisation: **CPRE Hertfordshire**

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	Hm 11, Hm 13	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

**Inappropriate site allocations: Hm 11 Shendish Manor and Fairlands and Hm 13 Polehanger Lane**

CPRE Hertfordshire is most concerned that the Pre-Submission Local Plan allocates two major Green Belt sites for residential development which were not included in the Regulation 18 Local Plan public consultations in either 2021 or 2023. These are Site Hm 11: Shendish Manor and Fairlands, and Site Hm13: Polehanger Lane, providing for up to 1250 units in total.

The magnitude of these proposed sites, and the lack of public consultation regarding their allocation constitutes a lack of compliance with the requirements for local community involvement. The Council is required by the NPPF to justify each allocation with regard to the appropriate legislation and policy and this includes effective and an appropriate level of community engagement and sustainability appraisal.

Significant changes were made just prior to the Reg 19 consultation with certain previously developed sites removed, and sensitive Green Belt sites included. This is unacceptable and



means that the Reg 19 could not respond to local community concerns in contravention of the Council’s Statement of Community Involvement  
If these sites were included in the results of the “Call for sites” at an earlier stage of the Local plan preparation process, it is reasonable to ask why they were not included at Reg 18 but are now proposed to be allocations in the P-SLP. No indication is provided of the reasons for their inclusion and this is a failure of legal compliance in this respect.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Removal of Sites Hm 11 and Hm 13 from the P-SLP.

(Continue on a separate sheet /expand box if necessary)

**Please note** your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.  
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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To make representation regarding the promotion of these two sites which have not been subject to appropriate public consultation.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

**CPRE Hertfordshire  
13/12/2024**