

**DACORUM PLAN (2020 – 2038) EMERGING STRATEGY FOR GROWTH**  
**REPRESENTATION BY THE TOWN AND PARISH COUNCILS OF DACORUM**

(v0.2)

N.B. - footnotes are included for the agreement process only and will be excluded from the final version

22<sup>nd</sup> February 2021

Dear Cllr Williams

The Town and Parish Councils in Dacorum are writing to ask that the draft Local Plan (the “Plan”) be withdrawn. Many of the councils will be submitting their own detailed comments but some of the underlying issues are common to us all and merit a joint response.

Any Vision which requires development on 746 ha of Green Belt land is contrary to the wishes of our communities as was overwhelmingly expressed in the responses to the 2017 consultation where nearly 95% of respondents didn’t agree with the proposed approach to Green Belt and Major Development sites<sup>1</sup>. It is clear from your letter of 30<sup>th</sup> November 2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current Plan<sup>2</sup>.

Development on Green Belt land runs counter to the Government’s response to the local housing need proposals of 16<sup>th</sup> December 2020 in which it stated “... *that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places*”<sup>3</sup>. We also understand that one of the reasons that the Inspectors halted the Public Examination of the St Albans Local Plan was its over-reliance on a few very large strategic Green Belt allocations. Finally we see insufficient evidence that Dacorum has looked widely enough to meet its housing commitments from less sensitive, more sustainable, sites.

We dispute the assumption in the Plan that the demonstrable benefit of the proposed release of Green Belt land outweighs the adverse impact as required by the National Planning Policy Framework<sup>4</sup>.

We appreciate that the pressure on the Green Belt comes from the standard housing methodology, and the difficulty of accommodating that methodology in a Borough which is so constrained by Green Belt and AONB. We also appreciate the difficulty of drafting a plan in the current exceptional

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<sup>1</sup> [http://www.dacorum.gov.uk/docs/default-source/strategic-planning/appendix-6---q9-to-q11---i-and-o-consultation-report-of-responses-september-2019.pdf?sfvrsn=6b530c9e\\_6](http://www.dacorum.gov.uk/docs/default-source/strategic-planning/appendix-6---q9-to-q11---i-and-o-consultation-report-of-responses-september-2019.pdf?sfvrsn=6b530c9e_6)

<sup>2</sup> See attachment – letter from Cllr Williams to Robert Jenrick 30/11/20

<sup>3</sup> <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

<sup>4</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf) 11.b

circumstances, against the vagaries of national policy, and the need to have a clear strategy in place to prevent uncontrolled development.

That said we cannot support using a housing needs methodology that is not based on up to date demographic and housing data, in this case the 2018 ONS data, and doesn't take sufficient account of Green Belt and AONB constraints; we fully support the request in your letter of 30<sup>th</sup> November 2020 that greater weight be placed on these constraints. We note that since publication of the Plan the Government has revised its method of housing needs calculation but oppose its proposal to revert to using out of date data from 2014<sup>2</sup>. We also note that on the 16<sup>th</sup> December 2020 the Minister stated that the Ministry's projected house building numbers are not a target<sup>3</sup>.

Given that the Government has withdrawn the housing needs methodology on which the Plan is based, that the revised methodology uses out of date data, that Dacorum's Borough, Town, and Parish Councils all agree that more weight should be given to the constraints of Green Belt land when calculating housing needs, and that the Government has stated that its projected building numbers are not a target, why has the Plan not been withdrawn until there is some clarity of what Dacorum's housing need is?

The Plan does not meet the needs of our communities and its ambitions will undermine the quality of life of our residents whether they live in towns, villages or rural areas. We ask that the Borough Council withdraws this Plan as it needs to be fundamentally re-shaped to reflect the Vision of the community to retain the Green Belt and the Borough's objectively assessed housing needs. As this will render any comments on the current version meaningless, please confirm that any revised Plan will be put to a second R18 consultation.

For and on behalf of

Aldbury Parish Council

Berkhamsted Town Council

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Bovingdon Parish Council

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Chipperfield Parish Council

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Flamsted Parish Council

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Flaunden Parish Council

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Great Gaddesden Parish Council

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Kings Langley Parish Council

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Little Gaddesden Parish Council

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Markyate Parish Council

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Nash Mills Parish Council

Nettleden with Potten End Parish Council

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Northchurch Parish Council

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Tring Rural Parish Council

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Tring Town Council

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Wigginton Parish Council

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