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Great Gaddesden Parish Council

Comments on the Dacorum Local Plan 2020 – 2038

Emerging Strategy for Growth

Response to Dacorum Borough Council's Regulation 18 Consultation,

December 2020 – 28th February 2021

Agreed by the Council 15th February 2021

Covering note

Great Gaddesden Parish Council strongly opposes the draft plan due to it being based on overstated and superceded housing demand figures, lack of detail on critical details such as infrastructure and sustainability, coupled with an unnecessary material expansion into the Green Belt, in direct contrast with the Government's stated aims and the views of the local community.

Specifically:

- the development of 5,800 houses on 17% on the border of the AONB and the associated increase in traffic both from this development and those in Berkhamsted and Tring represents an overwhelming and completely negative transformational change in the nature of the area, and will force a materially increased volume of traffic through existing chokepoints including multiple accident-prone single-vehicle passing places
- the majority of the proposed major developments cannot be described as "sustainable" given their distance from existing infrastructure and no plans of any substance to ensure improved and sustainable solutions
- critically, the sustainability analysis has an inherent bias and is misleadingly only based on land available for development rather than providing a benchmark against the ideal sites. There are demonstrably more optimal areas to develop that are immediately adjacent to existing sustainable transport infrastructure.
- neither the Infrastructure Development Plan not the Transport Plan are complete and under the current process it will not be possible to comment in any meaningful way on the Plan without the benefit of these significant elements.
- the Borough is adopting a housing growth figure which is not consistent with the Government's express intent to protect Green Belt land. The Government's response to the local housing need proposals of 16th December 2020 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".* Furthermore, in the responses to the 2017 consultation our community 95% of respondents didn't agree with the proposed approach to Green Belt

As such, Great Gaddesden Parish Council cannot support the flawed draft Local Plan and objects to its adoption.

1. Do you think the overarching vision and the strategic objectives are right for the Borough? (pp3 – 26)

No

1.1. General

We appreciate the fact that the consultation period was extended, although this should have been agreed at the outset rather than imposing a significant workload during a national lockdown and over the Christmas holidays, which self-evidently were always going to make it extremely difficult both to give the plan the attention it deserved and to undertake adequate public consultation.

However, we are still extremely concerned that the consultation has proceeded given that:

- shortly after publication the Government changed its guidance on the level of housing growth required by the Borough, a key driver of the plan, and it now

appears that the Borough is adopting a housing growth figure which is not consistent with the Government's express intent to protect Green Belt land.

- it is very difficult to understand how the majority of the proposed major developments can be described as "sustainable" given their distance from existing infrastructure.

- neither the Infrastructure Development Plan nor the Transport Plan are complete and under the current process it will not be possible to comment in any meaningful way on the Plan without the benefit of these significant elements.

Great Gaddesden Parish Council has a particular interest in The Hemel Garden Community (HGC) proposal. The development of 5,800 houses on 17% of the parish's land over the next 20+ years right up to the border of the AONB and the associated increase in traffic both from this development and those in Berkhamsted and Tring represents an overwhelming and completely negative transformational change in the nature of the area.

The Parish Council is concerned that:

- the proposals take insufficient account of previously identified urban capacity before building on the Green Belt.

- the sustainability analysis is misleadingly only based on land available for development rather than providing a benchmark against the ideal sites.

- the plan doesn't include any commitment to invest in the infrastructure necessary for small villages and hamlets in the Borough to prosper.

- whilst protecting the small villages and hamlets from housing development, the Plan is silent on protecting them from increased traffic; indeed, it seems that the intention is to re-route traffic from Hemel Hempstead in particular through the small villages.

The Plan does not meet the needs of our community and its ambitions will undermine the quality of life of our residents. We urge the Council to suspend the consultation process, to consult with the Government to obtain clarity on the appropriate housing target, and to re-submit the Plan for a further Regulation 18 consultation once the housing target is finalised and other key elements of the plan are completed.

1.2. National Policy Reforms

We sympathise with the problem of producing a plan against the background of proposed changes to the national policy framework, but given that uncertainty the Plan cannot afford to have any ambiguity about its relationship with that framework. For example, in the introduction to the main Plan document it states (1.8):

> "Although it is unclear how the Government will respond to the consultation [regarding the white papers on Planning for the Future and Changes to the current planning system] we have already taken some steps to reflect some of the proposals. These included … introducing the simplified zoning categories".

But in the section dealing with National Policy reforms (14.8) there is no reference to the impact of zones, and in the Green Belt and Rural Area Topic Paper it states (s2.27):

> "This [Planning] White Paper seeks to introduce a number of planning reforms to the planning system in England, please note these are only proposals to be aware of and they do not apply to this current Local Plan consultation that is taking place from November 2020 to February 2021".

We assume that the main Plan document takes precedence and that the intent is to adopt the three zone approach outlined in the White Paper, but if this is the case we are concerned that:

- given the uncertainty around house targets (see below) there is no clarity about what might happen were the plan to be adopted but the housing target reduced, since our understanding of the white paper proposals are that once an area is defined as a growth zone in an adopted local plan there is in principle agreement for the location, use, and amount of development on a site.
- there is no clarity about what might happen to the growth zones identified in the Plan if the amount of windfall housing exceeds the 2,400 estimated in the sources of housing land supply. Given that we are already aware of two proposed developments totalling 1,500 houses (21/00171/SCE 400 houses along Leighton Buzzard Rd and 1,100 homes in the Bulbourne Cross development near Berkhamsted) which don't feature on land identified for growth in the Plan this appears to be highly likely.
- there is virtually no reference in the Plan to protection zones.

The decision by the Government to withdraw some of the proposals in the White Paper only months after it was published amply highlight the risks of building a plan on a consultation paper.

We believe that it is inappropriate to base the Plan around the three zone approach until this is a statutory requirement.

1.3. Use of Green Belt land

The Plan calls for significant development on Green Belt land but is silent on the full extent of that development which has been estimated by CPRE at 746 hectares[1]. The use of Green Belt land is contrary to the wishes of our community 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. It is clear from Cllr Williams' letter of 30th November 2020 to the Secretary of State that the Borough Council recognises that the same concerns are likely to arise again from the current consultation.

Development on Green Belt land also runs counter to the Government's response to the local housing need proposals of 16th 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[2]".* We also understand that one of the reasons that the

[1] https://www.cpreherts.org.uk/planning/local-plan-responses/item/2645-dacorum-proposed-local-plan-has-unnecessarily-high-impact-on-the-green-belt

[2] 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

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.

The National Planning Policy Framework requires that the demonstrable benefit of the proposed release of Green Belt land outweighs the adverse impact of building on it. We dispute the assumption in the Plan that this hurdle has been met.

1.4. Housing needs assessment

We note that since publication of the Plan the Government has revised its method of housing needs calculation but we oppose its proposal to revert to using out of date data from 2014 which result in an increase in the target for housing needs in Dacorum (and Hertfordshire as a whole).

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 Cllr William's letter of 30th November 2020 that greater weight be placed on these constraints.

We also note that on the 16th December 2020 the Minister stated that the Ministry's projected house building numbers are not a target which in the context of those remarks we understand to mean that more weight will be given to Green Belt constraints.

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, and that the Government has stated that its projected building numbers are not a target, the Plan should be withdrawn until there is clarity regarding Dacorum's housing need assessment.

1.5. Transport and Movement

We support the Plan objective (2.13) that "new development needs to be located in places which have excellent access to jobs, shops, services and can quickly and easily be reached by sustainable public transport and benefit from high quality walking and cycling infrastructure", but this is completely at odds with the proposed major development sites, particularly in North Hemel Hempstead.

We have particular concerns:

- that in practice the prime consideration in site selection appears to be land availability rather than appropriateness or sustainability (Site Selection Topic Paper 2.35).
- that the Council is still "continuing to develop the transport proposals that will be included within the Plan" (21.18), providing only limited evidence as to how sustainable public transport will be delivered.
- about the implications of the new transport corridor to the north of Hemel Hempstead (10.4 & 21.17) on traffic through Berkhamsted, Potten End and Great Gaddesden Parish (in particular Water End).
- that the need to develop sustainable transport options for rural settlements seems to exclude settlements not identified for growth in the Plan (21.16).

This is our only opportunity to have a meaningful input to the Plan, and the transport infrastructure to support a planned 25% increase in population is clearly key to understanding how the Plan can be sustainable. We cannot support a Plan without the details of the transport plans which underpin it.

1.6. Infrastructure

Clearly when considering a proposed 25% increase in population the provision of adequate infrastructure is key, but there are only three pages about infrastructure development in the Plan (pp 49 – 52). The draft Infrastructure Development Plan (IDP) is available but will continue to be developed (10.5) and as a result it is difficult to know what reliance to place upon it. The Council itself recognises that:

> "The IDP is also a key tool in the assessment of development viability, which the Council is continuing to develop to ensure that the required infrastructure can be delivered and development remains viable." (10.5)

We are also concerned that, as with transport, improvements to the Borough's digital network appear to be limited to new development (21.50) making it harder to sustain existing smaller villages.

This is our only opportunity to have meaningful input to the Plan. We cannot support a Plan without the details of the infrastructure development that will underpin it.

1.7. Natural Environment

With the underlying chalk aquifer already assessed as being "over-abstracted" we have concerns over the ability of the water supply to be able to accommodate the needs of a 25% population expansion without impacting the natural environment.

1.8. Overarching Vision

The main problem with the Vision is not what it says, but what it leaves unsaid; no-where in the Plan does it state that the Vision is to build on 746 ha of Green Belt land up to the edge of the AONB. To represent the Hemel Garden Communities programme involving a development of 5,800 new houses as "delivering new … green spaces" (p23) when it involves building on 372ha of the Green Belt is quite simply a gross misrepresentation.

The Vision is also silent on the support to be provided to the surrounding small villages and hamlets. Improved digital connectivity and sustainable transport, in so far as it is possible to tell from the incomplete work in those areas, appear to be initiatives limited to the localities which will see housing development. The objective should be for all residents of Dacorum to benefit to ensure the sustainability of those smaller communities.

The Vision commits that smaller villages will be "protected from development" but is silent on the impact on those villages of increased traffic flows which are an integral part of the Plan. There should be a commitment to protect smaller villages from increased traffic flows.

The Plan does not meet the needs of our communities and its ambitions will undermine the quality of life of our residents both through the loss of open space and a failure to commit to invest.

It is not our Vision for the future of Dacorum.

2. Do you have any specific comments about the sustainable development strategy?
(pp 28 – 54)

Yes

2.1 Spatial Strategy for Growth

We understand that the Spatial Strategy for Growth was driven by a Government requirement for 922 dpa derived from the Strategic Housing Market Assessment (SHMA) as set out in the Planning Reform white paper published in August 2020 together with the Office for National Statistics (ONS) estimate of housing needs from 2018.

We have been advised by officers that the SHMA derived target is non-negotiable, and yet we note that on the 16th December 2020 the Minister stated that the Ministry's projected house building numbers are not a target[3] and the South West Hertfordshire SHMA cited in the Housing Policy (Supply and Delivery) Topic Paper (s. 2.39) states that:

> "The SHMA does not set housing targets. In effect, national policy sets out that development needs should be assessed leaving aside constraints (Stage 1) which is what the SHMA does. This is then brought together with evidence related to land availability, environmental and policy constraints (including Green Belt)"

The Housing Policy (Supply and Delivery) Topic Paper also states that:

> "The Government ... recognised that Local Authorities may not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere (2.21)
>
> The Government ... in its recent consultations on the Planning Reform White Paper and related changes to the planning system … (6.23)
>
> ... identifies the following factors that will form part of these adjustments (to housing requirement numbers) ..... the extent of land constraints in an area, including ... the Green Belt ..." (6.28)

The Housing Policy (Supply and Delivery) Topic Paper cites the new revised standard method (of the White Paper) in order to arrive at a local housing need to 922 homes pa (6.26). However, the White Paper Consultation document referred to states that:

> "The new standard method should ensure that all areas of the country are encouraged to build the homes their communities' need." (19)

Where is the evidence that Dacorum "needs" these additional homes? Particularly as responses received during the 2017 Dacorum consultation were summarised in the Housing Policy (Supply and Delivery) Topic Paper (s. 5.11) as:

> "There was significant support from key stakeholders, Town and Parish Councils, individuals, resident action groups and other organisations for protecting the Green Belt from development."

When the Government withdrew its SHMA proposals in December 2020, the Housing Secretary, Robert Jenrick, said in his statement to the House of Commons:

> "We heard clearly through the consultation that the building of these homes should not come at the expense of harming our precious green spaces. We also heard views that this need can be better met in existing urban areas."

We understand that when the Government withdrew the August 2020 SHMA it determined both to revert to the previous SHMA and also to the ONS figure for housing need from 2014. Whilst we understand that the Government has stipulated the use of 2014 ONS data, this is contrary to the National Planning Policy Framework which states (s. 31) that all policies:

> "should be underpinned by relevant and up-to-date evidence …."

Far from achieving the Government's objective of saving "our precious green spaces" the net result of the December 2020 change in policy was to increase Dacorum's housing target to 1,023dpa along with an increase in Hertfordshire's target by 19% whilst all other Home Counties targets are reduced from Surrey (-6%) to Sussex (-23%). Using the 2018 ONS data with the pre-August 2020 SHMA by contrast would reduce the target to a far more realistic 497dpa.

In summary:

- we do not believe that Green Belt land should be used for development.
- we urge the Council to challenge both the August and December 2020 housing targets which are clearly not in line with the intent of Government policy before proceeding further with the Local Plan.

2.2 Urban Growth Capacity

We are concerned that the 2017 Issues and Options consultation identified the potential for 476 dpa from Urban Growth and that after review this increased in the Development Strategy Topic Paper to c. 600 dpa or 10,954 homes (s.5.12). But in the main plan document (7.7) Urban Growth Areas are only quoted as 5,638 (or 313 dpa).

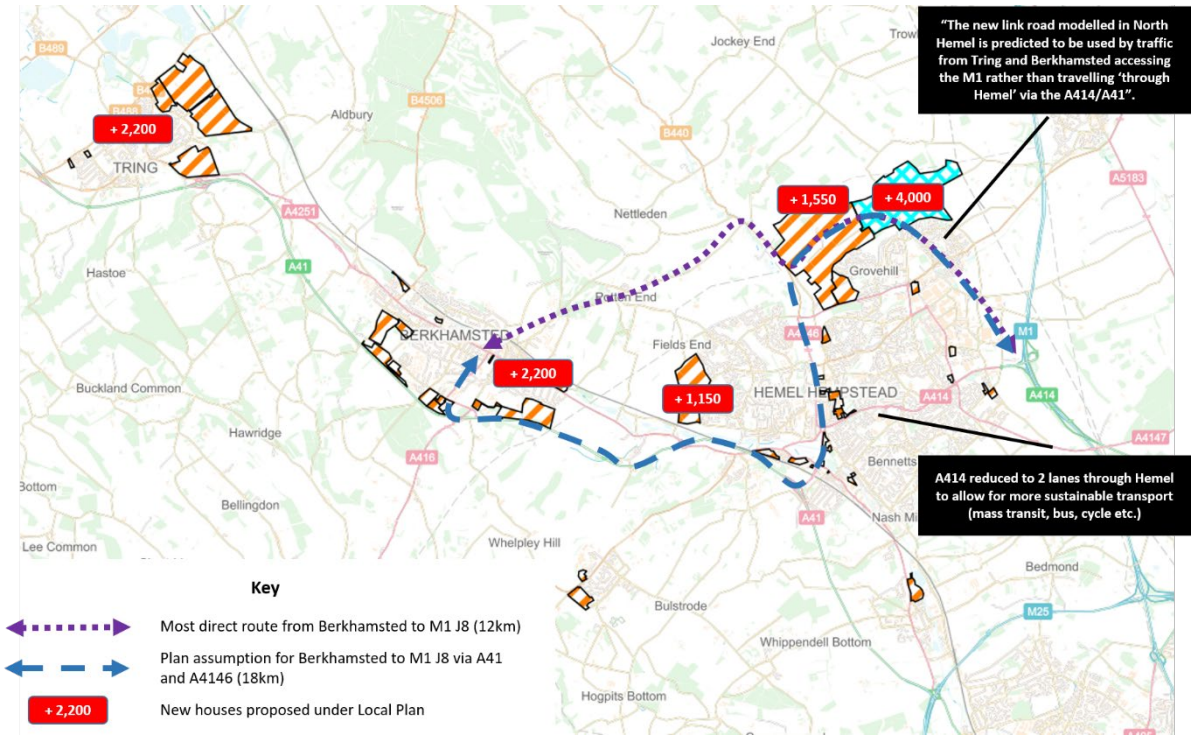
As the National Planning Policy Framework (NPPF) requires that the Plan fully explores the potential to make effective use of urban land (paras 118 and 137) , especially before considering the exceptional circumstances needed for releasing Green Belt land for housing purposes. Clearly the capacity to build an additional 5,000 houses in Urban areas would have a material impact on the plan, whatever the housing target.

2.3 Delivering the Infrastructure to Support Growth

Clearly when considering a proposed 25% increase in population the provision of adequate infrastructure is key, but there are only three pages about infrastructure development in the Plan (pp 49 – 52) and the Infrastructure Development Plan is incomplete (10.5).

We have a significant concern with the impact of the new transport corridor to the north of Hemel Hempstead and through the North and East Growth Areas (10.4) linking Leighton Buzzard Road to J8 on the M1 to be used by traffic from Tring and Berkhamsted and the Hemel Garden Communities. Despite the fact that the most direct access routes from the A41 to the new link road are all extremely restricted by single-lane bridges and tunnels, we are concerned that the alternative (south down the A41 to the A4146 junction, north up the A4146, east across the north of Hemel Hempstead and then south to J8 – see the map

below) is significantly longer and will result in increased traffic flows through Great Gaddesden Parish.



Broadly speaking it appears that Hemel Hempstead's traffic problems are to be exported to Great Gaddesden, Potten End and Berkhamsted. This is unacceptable.

We cannot support a Plan with inadequate information regarding the infrastructure developments required to deliver it.

3. Do you have any specific comments about any of the guiding policies? (pp 56 – 188)

Yes

3.1. Sustainable design

Policy DM22 states that new development will be expected to contribute to climate change mitigation including

> "Incorporate green infrastructure to sequest carbon, to include two or more new trees (a tree shall be considered to count if it ordinarily reaches a mature height of 6 metres or more) per dwelling or per 100 sq m floor space (for non-residential developments) on-site." (3c)

In general we support both the principle of this policy and the fact that it is measurable. However, if the target of two new trees is correct the policy should be for a net two or more new trees, i.e. a domestic dwelling that results in the loss of one tree should require the planting of at least three new trees? We would like to understand how this figure has been calculated and what objective it supports? For example, in terms of carbon sequesting, will this offset the loss of Green Belt land (noting that this isn't one of the purposes of the Green Belt)?

3.2. A414 strategy, Mass Rapid Transit and Transport Proposals

The Plan (21.15) states that

> "….priority will need to shift away from car-based transport towards a lower carbon future for movement …. The policy will therefore give greater emphasis on the provision of bus, cycle and pedestrian transport infrastructure through its enhancement, extension or addition of as appropriate;"

and (21.16) quotes the NPPF which states that

> "sustainable transport options will vary between urban and rural areas."

and in 21.34 states that

> "Passenger transport is also important for social inclusion as it offers access to travel to those … living in more rural parts of the Borough. However, the Council acknowledges that both services and the supporting infrastructure need to be improved to ensure greater uptake and to remove barriers to the most vulnerable."

The only detailed transport proposals included in the plan are the development of a Mass Transit System to connect Hemel Hempstead with Harlow using some of the A414 route (21.11), the need for a new northern corridor to serve Hemel Hempstead (21.17) and road junction improvements in Hemel, Berkhamsted and Tring (21.7). Otherwise 21.18 states that

> "the exact transport interventions and the timing of delivery will be detailed in the next stage of the Plan."

We fully endorse the need for more passenger transport, especially for rural areas, but in the absence of any detail of what is proposed, we cannot support the Plan.

With regard to the new Northern corridor, the Transport Topic Paper (p38 - 39) refers to an analysis undertaken using the COMET model developed by HCC to analyse the impact of the Plan on transport.

> "The model indicates that the A414 broadly operates within capacity with reduced flows through central Hemel Hempstead, due to a direct access being modelled from M1 junction 8 into eastern Hemel, the modelling of the new link road within the North Hemel Garden Community and the reduction of the A414 to one lane for general traffic in each direction in order to allow for improved public transport and active travel connections." (6.11)

> "It should be noted that in this model scenario the new link road allows an unrestricted connection from Leighton Buzzard Road to Redbourn Road and down to the A414 and M1. The final routeing and form of this link, known as the Northern Link Route, is yet to be finalised" (6.12)

> "The new link road modelled in North Hemel Hempstead is predicted to be used by traffic from Tring and Berkhamsted accessing the M1 rather than travelling 'through Hemel Hempstead' via the A414/A41>" (6.13)

We understand this to mean that as a result of the intention to restrict the width of the A414 through Hemel Hempstead to accommodate the proposed MRT system to Harlow and other public transport initiatives, that the plan is to re-route some of the through-traffic coming from the north that would otherwise use the A414 to the new link road in North Hemel Hempstead.

How is traffic from Tring and Berkhamsted supposed to access this new link road?

a) we see no suggestion of any improvements to existing roads or that there will be a new link between the A41 and Leighton Buzzard Rd.

b) to the north along the Leighton Buzzard Rd is the single-lane, weight restricted, bridge at Water End, already the site of frequent accidents and significant congestion at peak times.

c) the most direct route is from Berkhamsted in the west. This passes through the already highly congested crossroads in the centre of Berkhamsted, then via one of three single lane crossings of the railway, also the sites of frequent accidents, through the middle of Potten End before descending into Water End.

d) or traffic is expected to go south down the A41 to the A4146 junction, north up the A4146, east across the north of Hemel Hempstead and south to J8, a significantly longer journey than (c) above.

We understand from conversations with Officers that a Paramics Microsimulation will be commissioned to model the detailed impact on traffic flows as a result of the proposed developments. As this goes to the heart of the viability, let alone sustainability, of the Hemel Garden Communities proposal we don't understand why this wasn't commissioned sooner to form part of the evidence base and would be surprised if the outcome didn't indicate a significant increase in traffic through Water End.

In the absence of any detail of the transport interventions, it appears that Hemel Hempstead's traffic problems are to be exported to Water End, Potten End and Berkhamsted. There is no point protecting small villages from development, only to route increased traffic flows through them. This is both unacceptable and completely impractical.

We urge the Council to include a policy to protect small villages and hamlets from increased traffic flows as a result of the new housing development.

3.3. Digital connectivity

We support the Council's commitment to the introduction of new technology but the Council's Policy DM57 (Digital Communications) focuses solely on the delivery of Fibre To The Premises (FTTP) to new developments. What are the Council's plans to improve the connectivity of rural areas that will not have new housing developments?

3.4. Healthy Communities

We appreciate that the decision regarding a new hospital lies outside the control of the Council, but it does seem incongruous that the Plan includes proposals for a new crematorium (SP11.2.d) but not for a new hospital.

4. Do you have any comments about any of the delivery strategies? (pp 189 – 261)

Yes

4.1. Hemel Garden Community

The Hemel Garden Community (HGC) (23.6 – 19) envisages the development of 5,800 houses over the next 20+ years of which the majority fall within the parish of Great

Gaddesden which currently has 450 houses spread across five hamlets in an area which is entirely either AONB or Green Belt; this represents an overwhelming and completely negative transformational change in the nature of the area.

The plans envisage development right up to the AONB boundary and although we have been told that the development will be phased as it approaches the AONB to incorporate a country park and other open spaces we see no details of this in the Plan. It seems incongruous that Green Belt land is being withdrawn for development only for assurances to be made that some of it will be left "green". Why withdraw the Green Belt in the first place?

The Schedule of Site Appraisals for large Green Field sites of October 2017 for the equivalent Site HH-h1b North Hemel Hempstead (Phases 1 and 2) had under the Technical Studies Assessment "Exclude from further assessment and retain as Green Belt". What has changed?

The proposed HGC site appears to be directly in conflict with the Council's proposed Policy DM50.2.a which states that:

> "Locate development in areas that provide good levels of access to sustainable modes of transport and can make provision for its improvement."

This site lies between 4km and 8km from Hemel Hempstead station. In the absence of any transport plan it is impossible to see how this can be defined as having "good levels of access to sustainable modes of transport".

We have already expressed our significant concern at the impact and feasibility of the new link road from J8 of the M1 to Leighton Buzzard Road which forms part of the proposed development.

5. Do you have any specific comments about any of the proposals and sites (pp263 – 343).

Yes

Our comments in response to S4 (Delivery Strategy) apply.

6. Do you have any comments on the sustainability appraisal?

Yes

6.1. Sustainable development

The purpose of the Sustainability Appraisal Report is "to provide an assessment of the environmental, social and economic effects that would be likely to result from the implementation of strategies, policies and sites included in the Dacorum Draft Local Plan." (1.2)

What has been presented is a relative assessment of the sustainability of the available sites. We would argue that availability is not a function of sustainability and that the Sustainability Analysis should take as its benchmark the optimum location of sites based on the proposed criteria. Whilst this may not affect the relative ranking of the available sites, we believe that it would demonstrate the unsustainability of the proposed locations.

We have significant reservations regarding the sustainability analysis. For example, the Interim Sustainability Appraisal Report Non-Technical Summary states under the heading "sustainable locations" that:

> "Given the level of growth required by the plan, it is proposed that some development must take place on the edge of existing settlements which would be at a distance from facilities and services." (4.4.11)

Rather than "some", surely this should read "most"?

The same section goes on to say that:

> "it is unclear what infrastructure would be delivered to mitigate against negative effects in the absence of the Infrastructure Plan." (4.4.11)

If it is acknowledged that locating developments some distance from existing infrastructure, and with insufficient knowledge of the mitigating infrastructure to justify calling a location "sustainable", how is it that the "summary of assessment of spatial strategy and growth options" shows that Options, A, B and Ci (the development of the 3 main towns, just Hemel Hempstead, or development spread across the six main settlements respectively) can be described as "very sustainable" (3.3 and table 2)? This is a misrepresentation of the report's conclusion and should be either "have a negative effect which is not significant" or more likely, "have a significant negative impact".

Likewise when all three major development sites (east Tring, south Berkhamsted and north Hemel Hempstead) are only described as "likely to have a positive effect which is not significant" (and we would argue that this is already an overly positive assessment, certainly for north Hemel Hempstead), how does this result in Option A being assessed as "very sustainable" for sustainable locations?

6.2. Water supply

With regard to water supply, the Interim Sustainability Appraisal Report Non-Technical Summary notes that

> "… the underlying chalk aquifer is assessed as being "over-abstracted". Therefore, providing for a minimum of 16,596 new dwellings in the Local Plan period would increase this pressure …. and [the] risk of periodic water shortages increases." (4.4.2)

Whilst the Interim Sustainability Appraisal Report Non-Technical Summary goes on to say that the Plan includes policies to mitigate against adverse effects on water quality and over-abstraction we can only see one (DM33) which appears to deal with this issue.

In addition whilst the Interim Sustainability Appraisal Report identifies water as a potential incompatibility between the Sustainability Assessment objectives and delivering homes for everyone (s 4.6, figure 4.1), all of the site assessments only assess water as having an uncertain impact (5.4.3 and table 5.4). This inconsistency needs to be resolved.

The NPPF (s.170) expects planning policies to conserve and enhance the natural environment; we do not believe as stated that this objective is delivered by the Plan.

6.3. Conclusion

We are unable to follow the process by which the Sustainability Appraisal report has been constructed. It appears to be at best inconsistent, at worse designed to support a pre-determined narrative.

7. Do you agree that the evidence base that accompanies the plan is adequate, up-to-date and relevant?

No

The following are missing:

- A finalised infrastructure report
- A finalised transport report (including a non-technical assessment of traffic flows)
- A coherent Sustainability Assessment

8. Do you think the plan is consistent with the National Planning Framework and supporting guidance?

No

If the 2014 ONS figures for housing need are to be used then the Plan is not consistent with NPPF s.31 which states that "all policies should be underpinned by relevant and up-to-date evidence".

It is not clear that the NPPF requirement for the Plan to fully explore the potential to make effective use of urban land (s. 118 and s.137) before releasing Green Belt land has been met.

There is sufficient uncertainty in the evidence provided for water supply to question whether the Plan is consistent with NPPF s.170 which states that "Planning policies and decisions should contribute to and enhance the natural and local environment"

9. Do you have any other comments?

No