



Dacorum's New Local Plan: Issues and Options Consultation

Comments Form



Please return to Dacorum Borough Council, by midnight on Wednesday 13th December 2017. Comments received after this time will not be considered.

By online consultation portal: If you have internet access, it is recommended that you make your representations online at:

<https://dacorum-consult.objective.co.uk/portal/planning/lp/io/io>

Alternatively you can respond by:

e-mail to: strategic.planning@dacorum.gov.uk

post to: Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

If you have any queries, please contact the Strategic Planning Team on 01442 228660.

This questionnaire needs to be read in conjunction with the relevant sections of the Local Plan Issues and Options consultation document.

You do not need to answer every question: just those that are relevant to you or that you have a view on.

Personal Details

Please note that * denotes mandatory fields

Individuals Personal Details		Agent's Details (if applicable)
Title	Mr	
Name*	Colin Blundel	
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	White Hill	
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(This is the Council's preferred method of contact)

Please note: Your comments and personal details will be available for public inspection (apart from telephone numbers, email addresses and signatures) and therefore cannot be treated as confidential. **Your name and address must be completed for your comments(s) to be considered.**

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	<p>Question 1 Do you agree with the conclusions reached in the Sustainability Appraisal Working Notes that accompanies this Issues and Options document?</p>
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

Our main concern with the Sustainability Appraisal is that the SA Objectives do not sufficiently recognise the presence of the Green Belt designation across a large part of the Borough. As the SA goes forward into further stages of the Plan, we would like to see an additional objective assessing impacts on the openness and permanence of the Green Belt. Whilst the Green Belt is mentioned in the SA in relation to its impact on the setting of the AONB, we do not consider that to be sufficient.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 2 Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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The key cross-boundary issues of importance to the Society are the Green Belt and the Chilterns Area of Outstanding Natural Beauty. Both of these designations cover much of the Chilterns and cross the boundaries of a number of local authorities.

We work closely with the Chilterns Conservation Board in developing and promoting their Management Plan and guidance notes, which seek to adopt a common approach across the whole AONB in terms of conserving and enhancing its special features.

In relation to housing provision, we consider that a co-ordinated approach is required between local authorities to identify the locations for housing development on a more regional basis to try to reduce pressure for development in the AONB and Green Belt.

The Statements of Common Ground proposed in the recent Government consultation will need to address common approaches to Green Belt and AONB issues.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 3 Have we taken account of all relevant studies and reports as part of our Issues and Options work?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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In addressing issues in relation to the Chilterns Area of Outstanding Natural Beauty (AONB) the Plan needs to have regard to the aims and objectives of the Chilterns AONB Management Plan 2014 - 2019 and any subsequent update.

In addition, the Plan should refer to design guidance prepared by the Chilterns Conservation Board.

(Please continue on another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 4 Do you agree with the suggested vision for the Borough?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

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We support the proposed Vision for Dacorum in the second paragraph which relates to the natural beauty of the Chiltern Hills. The Vision could be significantly strengthened by the addition of a reference to the Chilterns Area of Outstanding Natural Beauty and the Green Belt in the Vision statement. Given the scale of development that is likely to be proposed in the Green Belt a positive statement needs to be made at the front of the Plan to say that it will be safeguarded from inappropriate development.

Overall, the Vision statement seems to lack any recognition of the scale of new development proposed elsewhere in the Plan and whether that will affect the Council’s ability to achieve the Vision.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 5 Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	✓

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>We consider that the Vision Statements are very good in relation to the economic and social aspects of sustainability, but are lacking in relation to the local environment.</p> <p>Given that the Chiltern Hills dominate large parts of the Borough and form the setting for many of the settlements they are not sufficiently referred to in the Vision Statements. Each statement should include clear environmental objectives and include references to the Chilterns AONB and its setting where applicable.</p> <p>The Visions also need to include references to the Green Belt and retaining the openness of the countryside around the main settlements. The Visions, as written in the Core Strategy, give no indication of the significant quantity of new development that is proposed in and around each of these settlements.</p> <p>Further issues in relation to these settlements are included in our response to Question 46.</p>

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 6 Do you agree with the suggested objectives for the new Local Plan?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	✓

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>Due to the large amount of development proposed in the District there is a significant threat to the landscape of the Chilterns AONB and the Green Belt from encroaching development. The Plan needs to clearly establish that it's proposals are within the requirements of the National Planning Policy Framework (NPPF) (Policies 79 – 92 and 115 – 116).</p> <p>Therefore, we consider that 2 additional objectives need to be placed under 'Looking After the Environment' as follows –</p> <ul style="list-style-type: none"> • To conserve and enhance the landscape and natural beauty of the Chilterns Area of Outstanding Natural Beauty (AONB) • To maintain the openness of the Green Belt and ensure that it is a permanent feature of the Borough.

(Please continue on another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 8 Do you agree with the proposed broad approach to distributing new development?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	✓

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>We are broadly in support of the settlement hierarchy approach proposed, concentrating on the larger settlements. It has to be remembered, however, that the towns are immediately surrounded by the Chilterns Landscape, including both the AONB and the Green Belt.</p> <p>The bullet points in paragraph 5.1.2 could be better clarified. Saying that development will minimise impacts on the Green Belt is a bit misleading when large areas are proposed to be removed from the Green Belt to accommodate development around the towns and villages. 'Minimising' suggests a very small amount, but this is clearly not the case.</p> <p>The bullet point in relation to countryside and landscape could also refer to 'including the Chilterns AONB'.</p>

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 9 Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	✓

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>We are generally opposed to development within the Green Belt because it is an essential component in maintaining the openness and character and appearance of the Chilterns landscape.</p> <p>Given that half of the Borough is designated as Green Belt and much of the rest is either built on or within the AONB we may have to reluctantly accept that some development may have to take place in the Green Belt, particularly where it is immediately adjacent to towns and larger villages. We would expect the Council to adopt a housing target that can be met within urban areas, brownfield sites and sites where the Green Belt is no longer considered to meet its purposes. The latter must be sites identified through the Green Belt Review. Any incursions into the wider Green Belt must be able to demonstrate very special circumstances, and we do not accept that demand for housing on its own creates such a circumstance.</p> <p>The housing requirements identified for Dacorum are very high and it is difficult to see how development could be accommodated in adjacent districts as they have their own high housing targets and significant areas of Green Belt or AONB. However, to get the best outcome for the Green Belt, Dacorum needs to work with adjacent authorities to take a co-ordinated approach to the Green Belt. This may cross over Housing Market Areas in Hertfordshire and Buckinghamshire.</p> <p>We are pleased to see in 5.2.4 that most of the Green Belt meets the Government's criteria for designation.</p> <p>We consider that encroachment into the Green Belt must be a last resort for development. As the Plan emerges it will need to demonstrate that it has fully considered brownfield sites, sites within towns and villages and sites outside the Green Belt and AONB before considering Green Belt boundary changes and site allocations. Paragraph 5.2.7 starts to set out a structured approach.</p>

In particular, the Council needs to assess the 5 purposes of the Green Belt set out in paragraph 80 of the NPPF and apply these to potential development sites. Housing in the Green Belt is, by definition, inappropriate development and the Council will need to demonstrate that there are very special circumstances for allowing this development. Our view is that the need for additional housing does not provide a sufficient reason for exceptional circumstances to exist.

Where land is proposed to be removed from the Green Belt, additional land should be identified to create new Green Belt elsewhere in the Borough where the land can be demonstrated to meet Green Belt purposes. It is possible that some of these sites could also be in the AONB, giving them additional protection from development.

Paragraph 5.2.6 raises the issue of infrastructure to ensure that developments are sustainable. This is an essential element of any decision to encroach of Green Belt adjacent to the towns. Such infrastructure needs to be carefully planned to minimise the loss of openness and maintain the quality of the landscape.

The Green Belt is an essential element in finalising the capacity of Dacorum to cater for new development. Therefore, development needs to be restricted to the absolute minimum in terms of numbers of dwellings to protect the important local environment of the Borough.

We are supportive of the approach to Major Developed Sites.

We would support the retention of the use of village boundaries, but the Council would need to find a way to ensure that they are defensible in relation to planning applications and appeals.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 10 Do you agree with the proposed approach to the Rural Area summarised above?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Given that the Council is likely to allocate land for housing in the Green Belt, we are very concerned about land within the Chilterns AONB being treated in a 'similar way to the Green Belt', suggesting that it could be allocated for development. In order to allow major development in the AONB it would need to meet the requirements of paragraphs 115 and 116 of the NPPF.

We would expect the emerging plan to contain a strong policy restricting development in the AONB and then only minor development in existing settlements.

Some areas of the Borough are both AONB and Green Belt, so these areas must have a maximum level of protection.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 11 Do you agree with the proposed approach to selecting sites?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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We support the proposed hierarchy and particularly the proposal to maximise the use of brownfield sites ahead of greenfield sites.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	<p>Question 13 Do you agree with the proposed approach to ensuring good quality design within Dacorum?</p>
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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We particularly welcome the inclusion of the Chilterns Conservation Board Management Plan and design guidance.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	<p>Question 15 Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment?</p>
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Whilst we have no objection in principle to the Housing Market Area used in the assessment, we do have concerns that a wider view needs to be taken in relation to the protection of the London Green Belt and the Chilterns AONB.

Both of these areas are partly within Dacorum but extend into a number of neighbouring districts, both within and outside the Housing Market Area. There is pressure for development in all of the districts, so a more regionalised approach involving Housing Market Areas for Oxfordshire, Buckinghamshire and Bedfordshire would help to direct development to the right locations, minimising impacts on the wider Green Belt and AONB. This is a topic that could form part of the Statements of Common Ground being proposed by the Government.

The lack of a regionalised approach is likely to lead to individual authorities having to meet their own housing targets, and then in areas such as Dacorum with a large area of Green Belt and AONB there is unlikely to be an alternative to encroachments into these areas.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 16 Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)	✓	(b)		(c)		(d)	

Comments
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Using the SHMA figure of 756 per year would create greater pressure on the Green Belt and therefore more sensitive areas would be likely to be allocated.

The top figure of 1000 to 1100 would be totally unacceptable and create a major threat to the openness and permanence of the Green Belt. The Council would struggle to meet the 5 purposes of the Green Belt set out in paragraph 80 of the NPPF. Our understanding from the exhibition events was that if the Council does not have a Local Plan in place by September 2018 (when the existing Plan is 5 years old) then the Government will impose these figures on the Council. The timetable for the new Local Plan is for adoption in 2019 so that deadline is likely to be missed. We believe development on this scale would be a disaster for Dacorum, requiring large areas to be taken out of the Green Belt for development and extensive new infrastructure built to serve the new developments.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 17 Do you agree with the proposed approach to affordable housing?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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We believe there is a substantial demand for affordable homes, with around 6000 people on the Council house waiting list. Building these smaller units within the towns would ensure that they are easily accessible by sustainable modes of transport whilst also making good use of brownfield land. By putting developments in the towns, more of the housing need could be met without having to encroach on the Green Belt or the AONB.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 19 Do you agree with the proposed approach to the timing of site delivery?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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We consider that it is essential that controls continue on the release of Green Belt land for development. Given the large areas of Green Belt and AONB potentially under threat, pressure must be put on developers to prioritise brownfield land, and particularly in the towns and larger villages.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 25 Do you support the proposed approach to the natural environment?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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We strongly support the approach proposed to protecting designated area such as the Chilterns AONB and putting landscape character at the centre of decision making.

As the plan develops, it is essential that this approach to the environment is applied strictly and consistently in identifying the choice of sites for allocation. Environmental harm from development in the countryside is a significant threat if the level of housing proposed is to be delivered.

(Please continue on another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 26 Do you support the proposed approach to the historic environment?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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We support the approach proposed. It is essential that these constraints are fully considered when identifying sites to meet the proposed housing need.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	<p>Question 29 Do you agree that we have covered all relevant issues relating to physical infrastructure?</p>
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

Impacts arising as a result of this infrastructure provision on the Green Belt and AONB will need to be fully considered against the proposed environmental policies and sustainable solutions should be promoted wherever possible.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	<p>Question 30 Do you think that we have covered all relevant issues relating to social infrastructure?</p>
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

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We agree that social infrastructure is essential to new and existing communities. New provision needs to be considered in relation to major new developments to help to minimise increases in traffic that may impact on the AONB of the Green Belt.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 31 Do you think that we have covered all issues relating to green infrastructure?
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

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The plans need to provide more information on its approach to strategic green infrastructure. Plans on a Borough-wide basis are required to ensure that existing areas of green space are linked together and that any significant developments include networks of green infrastructure that link the countryside into the towns.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	<p>Question 33 Do you agree that the three growth levels proposed are the most reasonable to consider?</p>
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For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)

Yes	✓	No	
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For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?

(a)		(b)		(c)		(d)	
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Comments

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We consider that the three growth levels considered are appropriate, but the plan could also have considered the lower figure (430/year) from the Core Strategy.

As we have stated elsewhere in the response, we do not consider that the proposed option of 1000 – 1100 homes is acceptable due to potential significant incursions into the Green Belt and possibly the AONB and its setting.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)

Question number	Question 36 Do you support the proposed locational principles?
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For all questions other than question 16

Is your answer to the question ‘Yes’ or ‘No’? Please tick (✓)

Yes		No	✓
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For question 16

Is your answer to the question ‘(a)’, ‘(b)’, ‘(c)’ or ‘(d)’?

(a)		(b)		(c)		(d)	
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Comments

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The locational principles should also refer to conserving and enhancing the Chilterns AONB and protecting the openness and permanence of the Green Belt.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	<p>Question 37 Do you agree with the rejection of the following growth distributions: 1. New settlement (town or village); 2. Rural growth; 3. Export growth to another Council area; 4. Use greenfield land before brownfield land; and 5. Significant expansion of a large village(s)</p>

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	✓

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments

The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.

In view of the large area of Green Belt and AONB within Dacorum, we consider that the Council should not rule out exporting growth to other Council areas. This issue needs to be considered on a more regionalised basis if true protection is to be afforded to the Green Belt and AONB. It will require several Housing Market Areas to be considered together and for Councils to co-operate through their Statements of Common Ground.

In relation to the Chilterns AONB, the constituent local authorities are signed up to the Chilterns Conservation Board and the AONB Management Plan. There is therefore a history of authorities working together to protect this nationally designated area. For the full benefits of AONB and Green Belt to be retained this co-ordinated approach is essential.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 40 Is Option 1B your preferred option for delivering the growth needs of the Borough?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes	✓	No	

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>Our main concern in the choice of options is to ensure that potential impacts on the Green Belt and AONB are minimised.</p> <p>The Green Belt Review should be used as a basis for identifying those sites that no longer contribute to the purposes of the Green Belt and are therefore more appropriate if incursions into the Green Belt cannot be avoided.</p> <p>In order to protect the Green Belt and AONB to the maximum possible extent we would prefer Option 1 as it would require the least number of houses overall and therefore less pressure on the Green Belt and AONB.</p> <p>Option 1B is probably the least damaging in that it would concentrate development on Hemel Hempstead where, although some sites are likely to be in the Green Belt, it would not encroach on the AONB. Concentration of development would help to create opportunities for a more co-ordinated approach to associated infrastructure. Option 1B also provides for some development at Tring and Berkhamsted and the larger villages, whilst limiting development in rural areas and encroachments into the Green Belt and AONB. This would spread out the effects to some extent.</p> <p>Option 1A could provide an alternative but would also lead to loss of Green Belt around Tring and Berkhamsted. Sites would need to be carefully assessed against the purposes of the Green Belt before being considered. Tring and Berkhamsted are also immediately adjacent to the AONB, and we would oppose development that extended into the AONB or impacted on its setting.</p> <p>Options 2 and 3 would significantly increase development in the Green Belt and AONB around the towns and villages and are not supported by the Society. If these options are to be considered, a detailed Landscape Assessment should be undertaken to assess impacts on the character and appearance of the AONB and the openness and permanence of the Green Belt.</p>

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

Which question are you responding to? (see list of questions below)	
Question number	Question 46 Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?

For all questions other than question 16

Is your answer to the question 'Yes' or 'No'? Please tick (✓)			
Yes		No	

For question 16

Is your answer to the question '(a)', '(b)', '(c)' or '(d)'?							
(a)		(b)		(c)		(d)	

Comments
<p>The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>The following is our initial assessment of the proposed sites -</p> <p>TRING</p> <p>Tring is being required to take much more than its share of housing. The development LA5 near the Cemetery has already been approved in principle and will probably be 240 houses.</p> <p>Option 1B is best for Tring with less development and no invasion of Green Belt according to the Plan.</p> <p>Option 3 would mean possibly 40% increase in the number of houses in Tring & loss of Green Belt. Green Belt must be protected, as Aylesbury is growing enormously (27,000 new houses). Aylesbury will extend to Aston Clinton, and so Green Belt is needed to separate Tring.</p> <p>Green Belt is important on all sites: it gives a soft edge between urban and natural environment. It is necessary to retain Green Belt in order to appreciate the Chilterns AONB.</p> <p>Any significant increase in population in Tring would change the character of the town, and the infrastructure in the town centre is inadequate re parking, schools, doctors etc. If too many houses are built, there will be insufficient employment opportunities.</p> <p>Affordable housing is of the utmost importance. We assume this is mainly for rent, but Tring also needs Starter Homes to buy.</p>

Tr-h1

The site at Station Road should remain in Green Belt, otherwise this will be a significant loss of Green Belt. The impact on the adjoining CAONB of any development would make it unsuitable. The proximity of the canal must also be considered, as it is a wildlife site and key green infrastructure. The site is close to the Chilterns Beechwoods SAC.

Station Road is too far from the town of Tring for services and employment.

Tr-h2

Land west of Marshcroft Lane should remain in Green Belt. The same arguments as for Tr-h1 pertain. It is too far from the town centre. Marshcroft Lane is a very narrow country lane, and unsuitable for significant traffic.

Tr-h3

The site known as Grove Fields is unsuitable for development as it is bordered by land with Article 4 Direction and has special views towards Ivinghoe Beacon. It is also bordered by CAONB on the other side of Bulbourne Road. This should remain in the Green Belt. Any future housing development would be seen from these specially designated areas.

This site is also too far from the town, and is lacking in infrastructure.

Increased housing should be avoided on this side of Tring which will become too close to a much-expanded Aylesbury.

Tr-h4

Development at Cow Lane/Station Road should be avoided as it is Green Belt and CAONB. It is also too far from the town, and is identified more with the surrounding countryside.

Tr-h5

The site at Dunsley is the best option, and it is on a bus route. And more importantly it is the only site which is very near the town centre and within walking distance, whereas all the other sites significantly increase car dependency – with parking and major traffic problems. Dunsley Bungalow and orchard should be excluded from development.

Tr-h6

Site along Icknield Way, known as Canal Fields must remain Green Belt. Any development would create a precedent of development along this special scenic stretch of countryside in the Aylesbury direction. This site is immediately adjacent to CAONB. There must be a boundary between Tring and much-expanded Aylesbury.

BERKHAMSTED

Berkhamsted is already subject to substantial development. It is a historic town situated in a steep valley with CAONB around part of it and it is largely within Green Belt. The pressure on infrastructure is severe, the road network is often difficult to move around and parking in the town centre and at the station in particular. In terms of health, the town is a long way from A & E facilities either at Watford or Stoke Mandeville, actually it is the worst situated in Dacorum for this, and the doctors' surgeries in the town are under pressure. Schooling has recently been restructured to try and meet existing need, but some children need to travel to Hemel Hempstead. The bus services are limited and in the main serve only the road along the bottom of the valley.

3 of the sites (h4, h5, h6) were not recommended in the earlier Stage 2 Green Belt Study, and h8 is not recommended for further consideration in this appraisal.

Be h1 land south of Berkhamsted

Due to the size of the total of plots (970) units this effectively would create a new "village" and would require its own facilities as it is some distance from the main town.

BE h2 Haslam Fields, Shootersway

This proposal for 80-100 units would mean loss of greenfield land and school playing field although owned by the Berkhamsted Schools Group who propose retaining a portion as open land, this should be made a condition. Transport links should be provided as it is on a steep slope making walking and cycling into main facilities difficult.

Be h3 land at Ivy House Lane

This is adjacent to the CAONB and whilst mitigation is suggested, the form this will take needs careful consideration before proceeding.

Be h4 land between Durrants/Bell/Darrs Lanes

This site was not identified for further assessment in Stage 2 Green Belt Review, so there needs to be compelling case for a change to provide approx. 200 houses. Bell Lane and Darrs Lane, and to a lesser extent, Durrants Lane are rural roads with gradients, bends and single lane traffic on parts of Bell Lane and significant highway works would be required to support what is already a crowded network, and the resultant strain onto a busy Northchurch High Street.

Be h5 Lockfield, New Road, Northchurch

This site was not identified for further assessment in earlier study. The impact on the Grand Union Canal and the adjoining CAONB should be carefully mitigated and there would have to be access improvement for traffic movements onto New Road.

Be h6 Blegberry Gardens, Shootersway

This site was not identified for further assessment in earlier study, it is near other Shootersway development and there are architectural issues. As 105 houses are proposed there should be a demonstrable need for this development.

Be h7 Land at Bank Mill Lane

Flood plain on part, no other comments

Be h8 Golf Range The Brickworks

This lies in the CAONB and has not been recommended in current assessment, the proposal for Care Home. This is far from the town centre and better access would need to be provided.

HEMEL HEMPSTEAD

HH-h1a and HH-h1b North Hemel Hempstead (Phases 1&2)

Green Belt and Landscape Conservation Area

Land rises steeply from Leighton Buzzard Road (A4146)

This area was excluded from assessment and retained as Green Belt in the Council's Green Belt Review as it was considered to be of high landscape sensitivity.

HH-h1a adjoins the small settlement of Piccotts End which is a Conservation Area with high Archaeological and Heritage Significance. This settlement will be consumed by the major development which is unacceptable given its historic importance.

The site is on the edge of Hemel Hempstead and therefore will increase the visual damage to the area as the site is visible from long and short distances, especially from the other side of the valley which is also Green Belt and a Landscape Conservation Area. It will severely damage Ancient Woodland and as the ecological assessment has not been undertaken this site's inclusion is premature.

A large portion of HH-h1b lies within St Albans and therefore will not add to Dacorum's housing stock although the majority of its impact will be felt by Dacorum. There must be cooperation from St Albans over this area.

Major infrastructure is proposed which will further urbanise this very sensitive location on the urban edge including a new road through the entire site from Leighton Buzzard Road. This road at present only has minor road junctions which have limited impact on the environment. A new major road would severely impact on the environment given the need for lighting and signage.

The offer of a parkland buffer is visually and ecologically inappropriate as the area is currently open farmland and woodland.

This is a very sensitive area as an open attractive, undeveloped gateway into the urban area. The Council in its Adopted Core Strategy states that the key role of the countryside on the edge of Hemel Hempstead is to maintain the physical separation from smaller villages and hamlets on its periphery and to maintain the Gade valley which provides a strong landscape setting for the town (para.8.24). Clearly development will severely affect this, eroding the landscape setting and reducing the separation between Piccotts End and Hemel Hempstead. On the northern end of this proposal, the separation between Hemel Hempstead and St. Albans will be considerably reduced.

Conclusion: This proposal is contrary to one of the purposes of the Green Belt which is to stop the coalescence of towns and villages. This site will consume Piccotts End in the south and reduce the separation of Hemel Hempstead and St Albans in the north. It lies within the most visually and ecologically important edge to Hemel Hempstead and any major development will result in severe damage to the whole area. There should be no development near or around Piccotts End and no new access from Leighton Buzzard Road. The ancient woodland must be protected.

HH-h2 North of Gadebridge (Land at Piccotts End)

Green Belt and Landscape Conservation Area

Land rises steeply from Leighton Buzzard Road (A4146). This is a very sensitive area as an open attractive, undeveloped gateway into the urban area.

The site is on the edge of Hemel Hempstead and therefore will increase the visual damage to the area as the site is visible from long and short distances, especially from the other side of the valley which is also Green Belt and a Landscape Conservation Area.

This is a very sensitive area as an open attractive, undeveloped gateway into the urban area. The Council in its Adopted Core Strategy states that the key role of the countryside on the edge of Hemel Hempstead is to maintain the physical separation from smaller villages and hamlets on its periphery and to maintain the Gade valley which provides a strong landscape setting for the town (para.8.24). Clearly development will severely affect this, eroding the landscape setting and reducing the separation of Piccotts End and the village of Potten End.

Conclusion: this site lies within this sensitive visually and ecologically important edge to Hemel Hempstead and any major development will result in severe damage to the whole area. Object

HH-h3 Land at Shendish, London Road

Green Belt and Landscape Development Area. This is a major southward expansion of Hemel Hempstead along the Gade valley into open countryside. There is extensive tree coverage. It 'wraps around' Shendish Manor (a listed building) which is in a parkland setting (a locally Registered Garden of Historic Interest). It is of high landscape sensitivity and importance to the southern part of Hemel Hempstead.

The land rises steeply from London Road (A4251), and will 'fill-in' the gap between Rucklers Lane and the mixed development of Apsley. It will also effectively join the 'settlement' of Nash Mills. The loss of open countryside and the possible reduction in size of the golf course is unacceptable. The tree coverage, which must be retained, further limits the extent of development. Access in this area is limited with London Road through Apsley suffering severe congestion at most times.

Conclusion: Some limited development maybe acceptable but the setting of the listed buildings must be protected and the extensive tree coverage must be retained. Development should not extend along London Road and the severe access problems must be addressed.

HH-e1 Land east of A41 at Felden

This is building on open countryside separated from the main area of Hemel Hempstead by the main line railway and the A41 slip road. Access is difficult. It lies close to Roughdown Common SSSI and wildlife site which would be severely damaged by development. The Council has not recommended further assessment for a Green Belt boundary review.

Conclusion: Object

BOVINGDON (Large Village)

Bov-h1 Land at Grange Farm

This involves the southward expansion of the large village of Bovingdon into open countryside. It is someway from facilities in the village core which are already under strain from recent development. There are defined road boundaries to limit further development.

Any development must improve village facilities including school and health facilities which are already under strain. The High Street suffers severe congestion and measure should be imposed to alleviate this.

Bov-h2 Land south east of Homefield

This is bordered on two sides by housing development although open countryside lies to the east and south. Landscaping must provide a soft edge to the settlement.

Any development must improve village facilities including education and health facilities which are already under strain. The High Street suffers severe congestion and measures should be imposed to alleviate this.

Bov-h3 Land r/o Green Lane/Louise Walk

This lies south of proposed site Bov-h3 which would provide a considerable expansion of the village to the south east. Part of the site extends beyond the south eastern boundary of Bov-h2 which is an incursion into open countryside. This part of the site is unacceptable and should be retained as open countryside.

Any development must improve village facilities including schools and health facilities. The High Street suffers severe congestion and measures should be imposed to alleviate this.

Bov-h4 Land at Duckhall Farm, Newhouse Road

This fills in the gap between houses in Hempstead Road and the Mount Prison. Its location is close to the village core although any development must include improvement to village facilities including schools and health facilities. The High Street suffers severe congestion and measures should be imposed to alleviate this.

KINGS LANGLEY (Large Village)

KI-H1 Land at Hill Farm, Love Lane

This results in a northward expansion of the Large Village of Kings Langley and proposes high density housing. It is adjacent to a conservation area and Listed Buildings and access maybe a problem as it is off a relatively narrow road which also serves a large secondary school. The site extends to the A41 bypass and provision for a soft buffer to the open land to the north. It is a considerable way from the village services and facilities which will need to be assessed for capacity.

KL-h2 Land at Rectory Farm, Hempstead Road

This site involves the northern extension of the village and is bordered by the Grand Union Canal and Hempstead Road. Part of the site is already developed for commercial purposes so its redevelopment offers the opportunity to enhance the area especially along the canal frontage. It is also a flood area which will need to be assessed. It is close to the main facilities of the village but their capacity will need to be considered. It also is eroding the buffer between the village and Hemel Hempstead which is contrary to Green Belt objectives.

KL-h3 Land to the east of A41 and Wayside Farm, Watford Road

This is a sizeable site of 60ha and its development would considerably change the character of the area and of this large village. Stage 2 Green Belt Review excluded it from further assessment. It would extend built development from the village along the Watford Road (A4251) to the junction of M25/A41 and up the valley side to A41. This would result in excessive loss of Green Belt, totally change the character of the village and materially affect the Gade valley. Mixed development is proposed which may be acceptable near the railway station but development on this scale will need further detailed assessment. It would lead to a very small gap between Kings Langley and Watford – contrary to the purpose of the Green Belt to it becoming a suburb of Watford (para.8.24 of the Dacorum Adopted Core Strategy.)

***The cumulative effect of all the developments proposed at Kings Langley results in the loss of nearly 80ha of Green Belt land and totally change the character and appearance of the village and the area as a whole and totally consume the currently modest size of the village.

MARKYATE

My-h1 Land south of Markyate

This site is at the edge of the village close to the A5. It will have an impact on River Ver but it may present an opportunity to improve its environs. Part of it is within a flood plain but it could provide development on a smaller scale.

My-h2 Land at Pickford Road

This lies within the Rural area and adjacent to CAONB and a Wildlife Site which would be severely affected. It is at the southern entry to Markyate. It extends development into open countryside and is at a distance from the facilities of the village and is on the top of a steep hill, making walking/cycling to the village centre difficult. The site is unacceptable on these grounds.

POTTEN END

O-h1 Land at Old Kiln Meadow, Water End Road, Potten End

This site is put forward purely speculatively as in the small villages within the Green Belt only development providing for local need is acceptable. No local need assessment has been carried out therefore it is premature to include this. The proposal for up to 49 dwellings is far in excess of local need in this village. It extends the village long Water End Road into open countryside and would need to provide a soft edge to the open land. There has not been a study on the capacity of local services/facilities including the small village school and the village has very limited bus service. Object.

O-h2 Land to the north east of Grange Road, Wilstone

This is a village in the rural area and the site is located on the edge of the village extending into open countryside. No local housing need assessment has been undertaken and this is not a small expansion as stated (up to 42 units). The village has limited facilities and poor links to larger centres. Object