

DACORUM BOROUGH COUNCIL SITE ALLOCATIONS EXAMINATION: OCTOBER 2016

Statement from CPRE Hertfordshire

MATTER 6 – GENERAL SITE SPECIFIC ISSUES, INSPECTOR’S QUESTION 1

1. I am Stephen Baker, DMS, BSc, Dip TP, MRTPI, Planning Manager at Campaign to Protect Rural England (CPRE) Hertfordshire.
2. This statement complements our original representations on the Site Allocations Pre-submission DPD 2014, and Focussed Changes 2015, which still apply, and seeks to address the Inspector’s questions as set out in her Matters, Issues and Questions document.

Question 1: Are the allocated sites appropriate and deliverable, having regard to the provision of the necessary infrastructure, affordable housing and other facilities, and taking account of environmental constraints?

3. Under each of the specific site Matters 7 to 10, the Inspector has asked if each site should come forward before 2021 if it is available. CPRE Hertfordshire considers that this question should be considered in the wider context not just of whether each site is appropriate and deliverable, but also whether exceptional circumstances exist now for each site to be removed from the Green Belt.
4. Please see our Statement on Matter 2, in answer to Questions 11 and 11a, where CPRE Hertfordshire states that it does not consider that such exceptional circumstances exist at this point in time as required by the NPPF, and by the adopted Core Strategy, which states in Policy CS 3 that ‘The sites listed in Table 9 of the CS *‘will be managed as countryside (ie. Green Belt or Rural Area, as appropriate) until needed* (CPRE emphasis) *for development*’, and not until after 2021. That need has not, in our opinion, been demonstrated.
5. Given the national Green Belt policy context set out in the NPPF, the need for the release of Green Belt land for development has not been demonstrated and this is not therefore justified or founded on a credible evidence base and is not appropriate when considered against available suitable land. CPRE Hertfordshire considers that exceptional circumstances do not exist which necessitate a change to Green Belt boundaries in the short term.

6. No Green Belt sites should be released for development until this action has been demonstrated as being necessary as an exception to Green Belt Policy through the thorough testing of the need for those Local Allocations proposals in the light of up-to-date information on housing need and supply, which we believe can only be carried out in the context of the review of the Core Strategy and publication of the Council's intended Local Plan. Irreversible decisions, to remove land from the Green Belt, which we consider to be unjustified and in conflict with national Planning policy, should not be taken now.