



BERKHAMSTED TOWN COUNCIL

COMMENTS ON THE LOCAL DEVELOPMENT FRAMEWORK ISSUES AND OPTIONS

**RESPONSE TO
CONSULTATION by
DACORUM BOROUGH COUNCIL
1st NOV TO 13th DEC 2017**

Agreed
at Full Council
11th December 2017

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Summary

Future development of Berkhamsted should be consistent with the Core Strategy adopted as recently as September 2013. The house building rates and the Green Belt releases around the market towns that are suggested in some options in the Issues and Options Consultation are a significant departure from existing policies in the Core Strategy. Adopting an option that requires large Green Belt releases around the market towns would mean that the Settlement Hierarchy described in the Core Strategy will have been abandoned. This Core Strategy must carry significant weight in the development of the Local Plan. In a letter from the Department of Communities and Local Government, dated June 2016, the Minister of State for Housing and Planning, Brandon Lewis, states that

“... Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and **with the support of local people.**”

The recent adoption of the Core Strategy, following the statutory consultation, with its commitment to the Settlement Hierarchy, would imply that large Green Belt releases around Market Towns do not have the support of local people.

In the same letter the Minister states:

“We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries”.

However, it is very clear from this consultation that the proposed Green Belt releases are driven entirely by the requirement to allow the development of more housing across the Borough. The urban capacity of Hemel Hempstead needs to be revisited in light of recent statements from central government on the opportunity to increase building heights in suitable locations. A revised and increased urban capacity for the Borough's main centre would reduce the need to provide for more Green Belt releases.

The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 (11 years ahead of target) while the rest of Dacorum lags behind target. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward.

Infrastructure deficits are now evident across the Borough and only the provision of housing on large sites can deliver the necessary supporting infrastructure without detrimentally impacting on existing settlements. The infrastructure of Berkhamsted is not fit for purpose in relation to current needs let alone any future housing development. The blanket assumption that large-scale growth makes delivery of infrastructure easier is misplaced – it will depend on the site and the viability. In the Dacorum Strategic Infrastructure Study [Feb. 2011] this is clearly stated:

“By contrast there are certain types of infrastructure that are more sensitive to the location of demand. Ideally, these types of infrastructure should be located close to the population that they are intended to serve as the extent of the area that they serve (in other words their “catchment”) is very local.”

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Supplementary Planning Guidelines, particularly in respect of Character Area Appraisals, should be maintained.

Protection of wildlife corridors should form an important part of any proposals. Future Green Belt releases can only detrimentally affect wildlife provision

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Question 1 *Do you agree with the conclusions reached in the Sustainability Appraisal working notes that accompanies this Issues and Options document?*

No

Development on Green Belt cannot offer any net “environmental enhancements”, the net effect can only be negative regardless of size and the larger the development the greater the negative effect.

Increased population would only help support the existing local economy if growth is focused within easy access of the existing centres.

Any new facilities within larger edge-of-town expansions may be required for the new settlements but would not benefit the wider community and in effect lead to these developments becoming “dormitory” developments, especially around the market towns. This is a fact that DBC stressed at the previous Examination.

The cumulative effects of developments have not been assessed. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed and catered for.

Berkhamsted has the most “negative but not significant” sites many of which are in close proximity to one another and to ongoing and planned developments.

Question 2 *Have we reflected all cross-boundary issues, or issues of particular importance to you or your organisation?*

Yes, but

DBC have reflected the issues but co-operation with St Albans was a key issue in the Core Strategy Inspection. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. Contribution towards Dacorum's housing target from the Gorhambury development should be included in this plan.

We also question the lack of consideration given to the significant housing developments in neighbouring parts of Bedfordshire and Buckinghamshire – particularly the substantial housing expansion of Aylesbury which will impact on the environment and infrastructure in West Dacorum.

Question 3 *Have we taken account of all relevant studies and reports as part of our Issues and Options work?*

No

Responses submitted to DBC regarding the studies undertaken in preparation for the Local Plan have been disregarded without any acknowledgement. For example, the Berkhamsted

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Residents Action Group (BRAG) produced a report highlighting flaws in the Green Belt Stage 1 report (see Q9). The BRAG report was accepted by Berkhamsted Town Council and submitted to DBC. Subsequently, BRAG highlighted problems with the second stage of the Green Belt Review, but none of the evidence offered on either occasion has been considered.

A report recently adopted by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB should also be considered and taken into account. This report argues that incremental change will cumulatively result in the loss of the special qualities of the AONB over the long term and that protected landscapes are complex webs of interconnected relationships which can be significantly affected if small pieces are lost. The report also highlights the importance of the siting and quality of developments, water abstraction, traffic and light pollution.

The Herts Valleys Clinical Commissioning Group commissioned a study in 2016 on "West Hertfordshire Hospital Trust Potential Redevelopment". This recommended part of the KL-h3 site as a preferred location for a hospital outside Watford. In response to questions later we will argue that the present planned health provision in Dacorum is not adequate and access to the Watford Health Campus will continue to be congested despite the new road system in Watford town centre. Consequently this site should be reserved for potential future health uses.

Question 4 *Do you agree with the suggested vision for the Borough?*

No, we have some concerns with the vision but believe that even as it stands it is undeliverable by any of the options being considered

For example, water supply, waste water management, power supply, health facilities, highway constraints, and secondary education are all major issues which can only be exacerbated by proposed development options.

It is difficult to see how access to the Watford Health Campus can be improved with the additional traffic that will be caused by the proposed scale of development. Health service provision within Dacorum should be improved, for this purpose we propose that part of site KL-h3 be reserved for possible future health purposes.

Elderly care has been omitted from the vision.

The 4th paragraph of the Vision should read: The market towns of Berkhamsted and Tring and the large villages should provide the necessary *infrastructure and social, health and community services* for their residents and surroundings.

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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, Bovingdon, or the wider countryside?*

Yes, but these new proposals will not be able to deliver them.

Question 6 *Do you agree with the suggested objectives for the new Local Plan?*

Yes, but we suggest some textual amendments

The 6th bullet point of "Sustainable Development should read: To conserve and enhance the function and character of the *towns*, villages and countryside.

The 2nd bullet point of Infrastructure and Delivery should read: To co-ordinate the delivery of *adequate* new infrastructure with development.

Question 7 *Do you agree with the proposed policy coverage of the new Local Plan?*

Yes

The policies identified are crucial – all options should be measured against them

Question 8 *Do you agree with the proposed broad approach to distributing new development?*

No

The current approach is proving incompatible with preserving the character of our market towns and Berkhamsted in particular, which has received a disproportionately large amount of development to date unsupported by improvements in infrastructure. To illustrate this point:

Between 2006 and 2016 the build rate of new housing in Hemel Hempstead averaged 279 pa against a Core Strategy target of 352 pa over 25 years (8800 in total over 25 years), in other words just 79% of the target rate. In Berkhamsted and Northchurch, on the other hand, the build rate between 2006 and 2016 averaged 63 pa against a target, over 25 years, of 47 pa (1180 in total over 25 years) - that is 34% above target. No additional infrastructure has been provided to support this in the Berkhamsted and Northchurch settlement.

Infrastructure always lags development and in some instances, such as road improvements to ease congestion, cannot be achieved in Berkhamsted given existing constraints.

The current allocation methodology also ignores "spill over effects" into neighbouring areas such as vehicle usage from LA3 into Berkhamsted. Planned development should not be a proportional arithmetic exercise when it comes to distribution.

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This matching of infrastructure and development would appear to be only achievable with large concentrated developments rather than through much smaller ad hoc developments/sites.

More consideration should be given to placing more (but not major) development in villages to support local amenities and ensure their vibrancy.

Question 9 *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

No

This approach under-plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas.

Chosen sites should be discrete, large and self-supporting to enable the necessary supporting infrastructure to be provided.

Both stages of the Green Belt Review are flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).

Previous conclusions on the important role of the Green Belt by a series of Planning Inspectors have been ignored in favour of the Green Belt Reviews produced by consultants whose starting point appears to be an assumption that current Green Belt policy is wrong.

We strongly agree with 5.2.6 about the need to consider the sustainability of proposed sites – infrastructure, accessibility, health and well-being issues are all crucial. Consideration of the impact on the character of each town or village is also fundamental.

We note the Inspector's Report to Dacorum Borough Council [PINS/A1910/429/4, July 2013] which states, with reference to Market Towns, "...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town". [para 39]

Question 10 *Do you agree with the proposed approach to the Rural Area summarised above?*

Yes, but the Chilterns AONB needs specific policy protection.

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Question 11 *Do you agree with the proposed approach to selecting sites?*

No

Policy CS1 of the Core Strategy states that

“Any new development should:

- (i) be based on the neighbourhood concept;
- (ii) provide for its own infrastructure; and
- (iii) support relevant town wide needs.”

This policy also states:

“The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it:

- A) is of scale commensurate with the size of the settlement and the range of local services and facilities;
- B) helps maintain the vitality and viability of the settlement and the surrounding countryside;
- C) causes no damage to the existing character of the settlement or its surrounding countryside; and
- D) is compatible with policies protecting the Green Belt and Rural Area.”

Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted and Northchurch (1180 for 2006 – 2031) could not be sustained on infrastructure grounds. The market towns and large villages were identified as Areas of Limited Opportunity. In Table 1: Settlement Hierarchy of Core Strategy it is stated that “The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs.”

Significant Green Belt release on the edge of the Berkhamsted and Northchurch settlement will clearly breach these policy assurances.

We note again the Inspector's Report to Dacorum Borough Council [July 2013, Q9 for the reference no.] which states, with reference to market towns, “...However, it must be remembered that many of these settlements are more constrained than Hemel Hempstead, for example by the Chilterns AONB (which should be afforded the highest status of protection) and therefore more weight should be attached to securing sustainable growth in the Borough's main town.” para 39]

It is illogical to exclude large sites in excess of 3000. Large sites of 3000 or more should be included in the assessment as they provide the best opportunity to provide the necessary additional infrastructure.

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The current household build rate per annum in Berkhamsted and Northchurch is significantly above target, indeed at the current rate most of the estimated target capacity (1180) will be deployed by 2020 – that is 11 years ahead of target - while the rest of Dacorum lags behind target. It is apparent that Berkhamsted is already near its estimated infrastructure capacity. These disparities within Dacorum must be taken into account when assessing the allocation of development numbers across the Borough and site options.

The cumulative impact of small scale developments, including windfall, on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns. For example the construction of 100 dwellings as windfall over a number of years leads to the same infrastructure burden as an allocated site of 100. An assessment of the infrastructure requirements arising from a steady accumulation of “small sites” is needed, with a view to estimating future needs.

We support the maximisation of brownfield sites for development. However, their use should be accompanied by an assessment of their impact on infrastructure.

Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government white paper.

We strongly support development of brownfield sites before Green Belt sites are considered. However, this objective is contradicted and compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years).

The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach. More emphasis on e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.

Question 12 *Do you think that we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?*

No

Development is still being located in areas of Berkhamsted where, because of the topology of the town and the absence of public transport, residents use the car rather than walk or cycle. A much greater emphasis needs to be placed on the accessibility of sites to amenities by non-car usage when selecting sites. The sites put forward in Berkhamsted would only increase car usage and exacerbate associated problems of congestion and pollution in the town centre and adjacent roads.

In Section 5.5.1 it is stated “ ... policy requires plans to direct growth to ‘sustainable locations’ which enable maximum use to be made of public transport, cycling and walking ...”. Few of the proposed sites in Berkhamsted enjoy immediate access to public transport.

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There is no bus service hence mobility will generally be by motor car adding to worsening air quality in the town centre.

Question 13 *Do you agree with the proposed approach to ensuring good quality design within Dacorum?*

Yes

We strongly agree that design must be in keeping with the character of the town or village. Ridge-top developments are particularly intrusive and exacerbate negative factors. Design needs to take into account the new CCB report already referred to.

Question 14 *Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?*

Yes, but

We do not disagree with a list of titles – it is the content that matters and we haven't got that. This should be in place and consulted upon before any other decisions are made about sites.

The new report: Cumulative Impacts of Development on the Chilterns AONB, should be included.

Supplementary Planning Guidance, particularly the Character Area Appraisals should continue to be used.

Question 15 *Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment?*

Yes, but

We cannot see any justifiable grounds for St Albans not to be included.

Again the new housing proposed in nearby Bedfordshire and Buckinghamshire should be taken into account.

Reference needs to be made to the extent of commuting into London and the London Arc for work.

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?

a) A maximum cap of 602 as per the Government's draft figure

Growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints, particularly infrastructure, as should the allocation of development. It should be recognised that

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predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

The current household build rate per annum in Berkhamsted is nearly twice that targeted. At the current rate most of the estimated target capacity will be deployed by 2020 – 11 years ahead of target - while the rest of Dacorum lags behind target. Berkhamsted is already near its estimated infrastructure capacity. Such disparities within Dacorum must be taken into account when assessing development numbers and site options going forward. DBC figures ignore the major extension to East Hemel Hempstead that is proposed by St Albans. Notwithstanding St Albans reluctance to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply.

Para 6.1.14 is a misleading paragraph which appears to be designed to justify a high housing target. The Government consultation does not indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old. The consultation paper is not designed to disadvantage authorities working on updating their plans, indeed the consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment.

An Inspector may conclude that a local plan does not need to provide for its objectively assessed housing need if there are significant constraints. In a report dated 29 September 2017, in respect of the Adur Local Plan, the Inspector agreed that Adur District Council could not satisfactorily deliver its OAN for housing sustainably because of "the significant constraints that exist" and concluded that the Council's approach to housing was justified (PINS/Y3805/429/6 refers).

Question 17 *Do you agree with the proposed approach to affordable housing?*

Yes

Affordable housing should be delivered when identified as part of site development and not permitted to be 'bought out' by developers. We agree on the 40% affordable housing allocation but Dacorum needs to enforce the policy. All too often developers are allowed to reduce the allocation by paying a fee in lieu. This money is not necessarily spent on affordable housing in the same area. E.g. New Lodge in Berkhamsted. This offset practice should cease and "affordable" housing should be located in the same town/village etc as the site to which it relates.

Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc Local residents often cannot afford the high prices (in Berkhamsted in particular) so that housing is taken up not by 'local' residents but by new migrants to the locality. The data indicates that local residents at modest income levels relocate to e.g. Leighton Buzzard.

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Question 18 *Do you agree with the proposed approach to planning for specific types of housing?*

Yes, but

Berkhamsted is identified as having a high proportion of older population and so there is a need for the provision of specialist accommodation which should be close to the town centre and not reliant on car travel, cycling or walking up steep hills.

Para 6.3.26 of the Strategic Housing Market Assessment [SHMA] refers to residential and nursing care bed spaces, where it is asserted that the additional need is 680 beds (30 per annum), However this does not take into account the current shortfall. West Herts Hospital has lost 'step down' beds, and bed blocking is a recognised constraint at the main hospital, because of the lack of nursing care bed spaces. Such provision and its phasing should be reconsidered.

Berkhamsted has limited provision for one-person accommodation – this needs to be addressed in plans.

DBC should set proportional targets for specific types of accommodation. E.g. following the recommended housing mix in the SW Herts. Strategic Housing Market Assessment, viz. : 15% 1-bed; 30% 2-bed; 40% 3-bed and 15% 4+ -bed.

Question 19 *Do you agree with the proposed approach to the timing of site delivery?*

No

We agree that brownfield sites should be released first but there are critical contradictions within this section.

It needs to be confirmed that 6.4.2 relates to the 'Urban' sites [not Green Belt].

6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have a small effect but when combined they become intolerably large for towns like Berkhamsted.

We strongly disagree with para 6.4.4 – it will always be easier and more attractive to developers to build on greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The 'good reasons' identified in the recent Core Strategy still apply and should not be abandoned for expediency. This paragraph should be removed.

Areas allocated for possible development should be zoned and smaller parcels of land that small builders can develop should be allocated. This will avoid being wholly reliant on national housebuilders for large sites.

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Question 20 *Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?*

Yes

Question 21 *Do you agree with the proposed approach to meeting future jobs growth?*

Yes

Question 22 *Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?*

Yes, but

Land should not be removed from the Green Belt in anticipation of need – need must be proven before making such a change. Speed of technical change may alter needs and decision should therefore be delayed until need is imminent.

Question 23 *Do you agree with the proposed approach to meeting future retail needs?*

Yes, but

Agree retail development should be focused on Berkhamsted town centre to retain economic viability and character of this thriving market town.

Viability of 'local centres' must be proven before any acceptance as part of a development plan for any site. In the past these proposed 'centres' have been shown not to be commercially sustainable

Question 24 *Do you agree the proposed approach to encouraging tourism?*

Yes, but

More infrastructure is needed, e.g. hotels to support tourism as well as business. However, a balance needs to be struck as too much tourism could seriously harm both the urban and rural environments, e.g. Chilterns AONB. We note that the National Trust is having to construct a controlled car park at Ashridge Monument to deal with increased numbers of visitors. There is no allocated car parking for Berkhamsted Castle. The Grand Union Canal is a historic feature that would be damaged by excessive and insensitive canal side development.

Given the degree of traffic congestion in the town centres (especially Berkhamsted), there will come a time when tourists will find that the town is an experience to be endured rather than enjoyed.

Question 25 *Do you support the proposed approach to the natural environment?*

No

Ecological corridors need to be protected. Policy 96 of the saved Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local

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distinctiveness of the ecology of the area. Policy 102 deals specifically with sites of importance to nature conservation. PPS 9 also deals with biodiversity. A technical Study on Nature Conservation was carried out by Herts Biological Research Centre in 2006. In addition to identifying major Biodiversity Sites, the work identified important Biodiversity Corridors. Although such sites and corridors are not protected by statute their protection should form an important part of any assessment of housing site suitability. The constant removal of local habitat and resources is degrading and takes away the ability for biodiversity to function ecologically within the urban environment.

Removal of Green Belt for building does not enhance the 'Green Infrastructure', and building towards the edge of the A41 will also have adverse effects and drive wildlife out.

Reference to Cumulative Impacts of Development on the Chilterns AONB, Chilterns Conservation Board, should be made.

The section is silent on protecting the integrity of the Chalk Streams and aquifer, [referred to in 8.3.9].

Question 26 *Do you support the proposed approach to the historic environment?*

Yes, but the options proposed do not support it

Historic environment should encompass historic towns such as Berkhamsted – defining limited Conservation Areas whilst destroying the surrounding urban environment will have detrimental effects on the town as a whole and its contribution to the goal of increased tourism.

Para 8.2.3 refers to up-to-date Conservation Area Appraisals. Area Character Appraisals also make an important contribution to heritage assets. The section and Appendix A are silent on this. Policies should be included to guide Quality of Neighbourhood Design. It will be necessary to ensure adequate resources to conserving the historic environment.

Question 27 *Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?*

No.

The approach is proposing large releases of Green Belt and productive farm land. It also threatens (ancient) woodland, while doing nothing to prevent pollution.

National guidance states that development in areas at risk of flooding should be avoided – but sites with flood risk are included in the site appraisals and considered for development.

SFRA not yet completed – needs to be in place before decisions on sites made.

In 8.4.1 it is stated that new development should be in the most accessible locations but the sites proposed (esp. in Berkhamsted) are often in less accessible areas, AQMAs, and those

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with a flood risk. Actions are not following policies and ameliorating actions are in most cases inadequate e.g. Green Travel Plans.

Question 28 *Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?*

No

We agree in that it recognises that the main source of pollution comes from traffic emissions but

- this needs to be taken into account when suggesting development alongside major roads such as A41,
- increased traffic generation in Berkhamsted town centre and congestion on A4251 will be caused by large sites on ridge tops located at a distance from the town centre, which are not suitable for walking or cycling to the retail and service sector of the town,
- the proposals threaten (ancient) woodland rather than planting more trees which would actually help reduce the impacts of climate change,
- it is unlikely that district heating will be viable in Berkhamsted as there is no large industrial site nearby that can produce heat,
- a policy is needed that requires householders to adopt prevailing regulations on insulation standards when constructing alterations.

Question 29 *Do you agree that we have covered all relevant issues relating to physical infrastructure?*

No

The blanket assumption that large-scale growth makes delivery of infrastructure easier is misplaced – it will depend on the site and the viability. In the Dacorum Strategic Infrastructure Study [Feb. 2011] this is clearly stated:

“By contrast there are certain types of infrastructure that are more sensitive to the location of demand. Ideally, these types of infrastructure should be located close to the population that they are intended to serve as the extent of the area that they serve (in other words their “catchment”) is very local.”

We agree with principles of transport infrastructure in 9.1.1 – sites must meet this to be selected. Identified problems in Site Appraisal should disqualify sites for consideration. Roads required for the development of new sites cannot be regarded as infrastructure improvements for the community as a whole.

New development will exacerbate water and sewerage problems, power supply, health facilities, highway capacity, and secondary education.

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The assumption is made that various statutory providers can meet demand without substantive evidence to support this.

Proposed public transport options for proposed sites are not feasible.

The physical infrastructure in Berkhamsted already requires upgrades to accommodate the current number of residents and visitors. Any additional dwellings will impact negatively on the town centre.

Question 30 *Do you think that we have covered all relevant issues relating to social infrastructure?*

No

Education

The capacity of Ashlyns School, a listed building in the Green Belt, is likely to be a binding constraint if secondary school pupils are not to be bussed out of town. No site for another secondary school in Berkhamsted is available.

Health

Local Urgent Care facilities have reduced recently in Hemel Hempstead. The paragraphs on Healthcare, 9.2.4 and 5 mention the need to meet local demand for healthcare but local GP facilities are under pressure at the current population level. The section is silent on making land available to accommodate additional or new capacity in the locality.

There is no reference to mental health services.

Dementia care is not addressed.

Community Facilities

The concept of neighbourhoods is appropriate to Hemel Hempstead, but it is not appropriate to impose this concept on the market town of Berkhamsted by developing large 'commuter' sites on the periphery of the town with associated "local centres".

It is vital that the existing community facilities so importantly situated at the centre of Berkhamsted continue to be supported for the well-being of residents. There should remain a civic building in Berkhamsted town centre, with space for communal use.

Suggestions that facilities on the peripheral sites will be of benefit to existing residents is misplaced – they will weaken the vitality of the hub and diminish both the economic success and the community cohesion clearly evident in Berkhamsted

Question 31 *Do you think that we have covered all issues relating to green infrastructure?*

No

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It is recognised that Berkhamsted has a deficiency of public open space within the urban area, based on National Playing Fields guidance.

Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions

Question 32 *Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?*

No

CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in Berkhamsted. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficits to date and the need arising from the development options.

Throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has the highest rate of CIL and currently a higher build rate against target.

Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc. is not a sound proposal, especially in a period of economic uncertainty and increasing inflationary pressures.

Question 33 *Do you agree that the three growth levels proposed are the most reasonable to consider?*

No

See Q 16. Lower levels should also be considered.

Question 34 *Do you agree with the rejection of the following growth levels:*

No

See Q 16. The retention of a target build rate of c. 430 pa should be considered given the infrastructure constraints.

Question 35 *Has the Council considered all reasonable alternative levels of growth?*

No

See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored.

A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations.

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Question 36 *Do you support the proposed locational principles?*

Yes, but they cannot be achieved with these proposals.

Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. The 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, "within urban capacity".

Very dense developments are not appropriate for edge-of-town developments (see LTP which seeks to reduce carbon emissions *inter alia*).

Question 37 *Do you agree with the rejection of the following growth distributions:*

Looking at each in turn

1. New settlement (town or village)

Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally.

2. Rural growth.

Yes.

3. Export growth to another Council area.

No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total as Dacorum will need to provide the facilities and much infrastructure for this site.

4. Use Greenfield land before Brownfield land.

Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that.

5. Significant expansion of large villages.

Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.

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Question 38 *Has the Council considered all reasonable alternatives for distributing growth?*

No

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognized when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core Strategy [see Q9 for the reference] that development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting.”

Any additional development over and above that already planned for in Berkhamsted would create significant issues given the town’s infrastructure constraints and current deficits.

Moreover the Inspector said in Para 37 & 38:

“37. The Council’s approach to the settlement hierarchy is long-standing and it is at Hemel Hempstead that growth will be focussed. This accords with the former RS which identifies Hemel Hempstead as a key centre for development and change. Bearing in mind the sustainability credentials of the town there is no reason to conclude that the role of Hemel Hempstead in accommodating a high proportion of the Borough’s growth should be changed.

38. Berkhamsted and Tring are more traditional market towns where the scale of growth has been less than at Hemel Hempstead. The level of services and facilities is lower than at Hemel and although there will remain a need to provide additional housing elsewhere the Council’s approach of focussing growth on Hemel Hempstead is justified. “

Given existing constraints in the towns, focussing growth on Hemel Hempstead continues to be the better option to achieve infrastructure to match development.

There are many more permutations for growth distribution, but clearly DBC have restricted the options offered to fit with promoted land sites.

Question 39 *Is Option 1A your preferred option for delivering the growth needs of the Borough?*

No

This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7)

Question 40 *Is Option 1B your preferred option for delivering the growth needs of the Borough?*

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Yes

This is the best of the options offered and concentrates the growth on Hemel Hempstead which as a new town already has large amounts of public open space and is far better equipped/designed to grow. Forcing large amounts of growth on the market towns is not acceptable given the infrastructure limitations and would destroy their unique nature.

Question 41 *Is Option 1C your preferred option for delivering the growth needs of the Borough?*

No

This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7)

Question 42 *Is Option 2A your preferred option for delivering the growth needs of the Borough?*

No

This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7)

Question 43 *Is Option 2B your preferred option for delivering the growth needs of the Borough?*

No

This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).

Question 44 *Is Option 2C your preferred option for delivering the growth needs of the Borough?*

No

This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4.

Question 45 *Is Option 3 your preferred option for delivering the growth needs of the Borough?*

No

This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4.

This option is incompatible with preserving the character of the market towns and Berkhamsted in particular, which has received a disproportionately large amount of

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development to date unsupported by improvements in infrastructure. To illustrate this point:

Between 2006 and 2016 the build rate of new housing in Hemel Hempstead averaged 279 pa against a Core Strategy target of 352 pa over 25 years (8800 in total over 25 years), in other words just 79% of the target rate. In Berkhamsted and Northchurch, on the other hand, the build rate between 2006 and 2016 averaged 63 pa against a target, over 25 years, of 47 pa (1180 in total over 25 years) - that is 34% above target. No additional infrastructure has been provided to support this in the Berkhamsted and Northchurch settlement. The matching of infrastructure and development would only be achievable with large concentrated developments rather than through much smaller ad hoc developments/sites.

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics, heritage legacies and infrastructure constraints which should be recognised when considering housing allocations between them. Housing distribution should not simply be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. The Planning Inspector stated in his report on the Core Strategy that development in Berkhamsted "has to be balanced against the need to protect the town's historic character and setting."

More consideration should be given to placing more (but not major) development in villages to support local amenities and ensure their vibrancy.

Question 46 *Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?*

Yes

Be-h1; Land south of Berkhamsted

A significant loss of Green Belt here would create urban sprawl, contrary to one of the main purposes of the Green Belt. Currently there is a strong Green Belt boundary which forms a clearly defined and defensible limit to the built-up area. In its present open and undeveloped condition, this site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment. An important transition area between the town and open countryside would be damaged.

Much of the development here would be highly visible, being on a prominent ridge top location. In particular it is likely to be visible from the AONB, affecting its setting

The site has a poor relationship to existing town centre services and facilities, employment land and the railway station. The distance from the town centre and the ridge top location would discourage walking and cycling. Consequently, large-scale development would place significant pressure on the local highway network, particularly Swing Gate Lane, the

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Shootersway / Kingshill Way junction and Kings Road, especially given the possible cumulative impact of existing and other promoted development. Such cumulative development will also have a significant impact on the A41, which currently experience serious congestion during peak periods at the M25 junction and the exit at Aylesbury.

The proposal purports to offer an opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. But the proposed local store and pub are likely to prove unviable. Neither is the proposed development of a size that would have the potential to secure a range of social, leisure and community facilities. It would form an estate dominated by commuters a high proportion of whom would commute to work or make their journey to the station by private car, making a limited contribution to enhancing a sustainable and vibrant market town.

The site is not of a size to deliver larger-scale infrastructure, contributing to the improvement of transport links. The creation of an east-west link road (connecting Swing Gate Lane with Chesham Road) would not benefit the wider community. At the Core Strategy Hearing the Inspector accepted that this link was simply required to facilitate the proposed new development and could not be taken as a benefit for the community as a whole. It would facilitate access to the A41 from this site and thereby exacerbate the congestion problems on the A41.

The suggestion of a bus loop would not be viable; bus routes in Berkhamsted have declined in recent years.

A new primary school on this site does not fit with the existing provision for new schools in the present Plan.

There would be loss or damage to habitats, such as the Long Green and Brickhill Green wildlife sites. Development of this site threatens ancient woodland (Long Green).

The density of 35 dph is too high for the edge-of-town, and is incompatible with neighbouring character areas.

Be-h2; Haslam Fields, Shootersway

The ridge top location would encourage car usage. Increased car use, as well as leading to growth in the level of greenhouse gas emissions, would increase the congestion problem in Berkhamsted. The location at a distance from the town centre would discourage walking and cycling: exacerbated by the steep gradient between the town centre and the site, which make walking and cycling difficult. There will consequently be a cumulative negative impact on Berkhamsted infrastructure. In particular there is inadequate capacity on Shootersway: the impact of any development on the capacity of this road, Cross Oak Road, the junction with Kings Road, and Kings Road itself must be assessed alongside the cumulative impact of other proposed developments along Shootersway and to the west.

The density is too high and not compatible with neighbouring character areas.

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There will be a loss of playing pitches. The suggested replacement is even further from town centre (on other side of A41) and the use of this site would increase car journeys even more. ·

Be-h3; Land at Ivy House Lane

Development of this site will result in the loss of cultivated arable farmland.

The hill top location of this site means that cars will be the main mode of transport. But there is inadequate access. Access from Meadway is not possible as it is a private road. Access from Hunters Park would only be possible by demolishing a house. The capacity of Ivy House Lane cannot support this development which would require significant structural changes. Enhancements will not just be necessary for Ivy House Lane but also the railway bridge at the bottom of the Lane. This would cause a substantial increase in traffic congestion on already congested neighbouring roads (particularly George Street , Bank Mill, Bank Mill Lane, Gravel Path, Station Road, Ravens Lane, and the High Street) putting a strain on local infrastructure.

The density is too high given the character of neighbouring area.

There would be an adverse impact on the neighbouring Chilterns AONB. Widening the Lane to permit two way traffic and street lamps both on the Lane and the proposed development would have a significant impact on the AONB - including light pollution.

There is frequent run - off flooding onto the Lane at the base of the floor of the dry valley.

Be-h4; Land between Durrants Lane/Bell Lane/Darr's Lane (two sites).

A high density development in a prominent valley location would create an adverse impact on the landscape and setting of the AONB.

A bus service is unlikely to be viable. Berkhamsted bus routes have declined in recent years. There would therefore be an increase in car usage, congestion and pollution. There is a poor relationship to town centre services and facilities, employment land and railway station. Public transport cannot be used and walking and cycling is not viable given the steep gradient and distance to the local centre. Parking availability at the centre of Northchurch is already insufficient.

This development would exacerbate the expected traffic problems on Shootersway (see Be-h2).

In addition to the impact on Shootersway there would be increased traffic on Darrs Lane and Bell Lane - narrow, single carriageway lanes.

A new primary school on this site conflicts with existing Berkhamsted education planning policy.

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This site falls within an area of Archaeological significance. ·

Be-h5; Land at Lockfield, New Road, Northchurch

The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities. Upgraded access to New Road will be needed for which there are difficult sight lines, close to the bridge.

There will be increased use of the junction of New Road with Northchurch High Street, and this will also exacerbate existing parking difficulties in Northchurch.

There will be an adverse impact on the canal side setting, undermining the objective of “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne ” in the Vision.

The site is close to the Chilterns AONB and would negatively impact on the setting.

The site is too small to offer scope for additional town-wide leisure space.

The proximity to the railway line may make residents subject to noise. ·

Be-h6; Land adj. to Blegberry Gardens, Shootersway

This is an important transition area between the town and open countryside. There would be a negative impact on adjacent AONB and much of the site is protected by Tree Preservation Orders. ·

Situated at ridge-top location at a distance from employment, retail, health and community services,

a high- density development, set a large distance from key services, would encourage the use of the car. Being some distance from the town centre, all facilities and services will not be accessible by walking or cycling. There is no adequate public transport.

There will be inadequate capacity on Shootersway – given the cumulative impact of other developments in the road (see Be- h2).

The site is too small to offer scope for additional town-wide leisure space. ·

It is a site of archaeological significance. ·

Be-h7; Land at Bank Mill Lane

The site lies in a zone of flood risk.

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This site lies within the Berkhamsted Conservation Area and a major expansion of the town to the east would significantly alter the Gateway to Berkhamsted. It would also impact on the setting of the River Bulbourne and of the adjacent Chilterns AONB.

There would be significant intrusion into the Green Belt, creating urban sprawl and reducing the separation between the town and Bourne End.

The site has limited access to services, putting a strain on local infrastructure. The distance from the town centre services and facilities, employment land and station, would discourage walking or cycling to town. Additional road traffic would add to any congestion on the Swing Gate Lane roundabout caused by new traffic to and from “South Berkhamsted.”

The density is too high for the neighbouring Character Area.

Be-h8; Berkhamsted Golf Range, The Brickworks, Spring Garden Lane

The site has poor road access and is remote from local services. Public transport cannot be used and walking and cycling to the local facilities is not viable, consequently car usage would be encouraged.

A high- density development on a valley side in the Chilterns AONB would have an adverse impact on the landscape. This site is far from the immediate urban edge and would extend the town further into countryside. . .

The ridge-top location, with poor accessibility to employment, retail, health and community services and no public transport would lead to increased car usage . This would exacerbate increased traffic congestion on Shootersway (see Be-h2) and possibly also in Northchurch. .

General Comment:

See preamble to this document.
