

BTC SUMMARY PAGES FOR DRAFT PLAN REPLIES



BERKHAMSTED TOWN COUNCIL

COMMENTS ON THE DRAFT REG 18 LOCAL PLAN 2020

RESPONSE TO DACORUM BOROUGH COUNCIL CONSULTATION

Dec 2020 TO 28 FEB 2021

Agreed by the Planning Committee
XXXX Feb 2021

Introduction

This document has been prepared by a working party convened by the Planning Committee of Berkhamsted Town Council to assess and reply to the consultation on the Regulation 18 Draft Local Plan issued in November 2020. The comments have been assembled by Councillors and residents to reflect the concerns of local citizens on these matters.

The Draft Plan

We are conscious that the preparation of the Draft Plan by the Borough's Officers has been a mammoth task over many years. We commend their work which has drafted a coherent Plan that updates the multiplicity of documents that comprise the Policies set out by the Adopted Core Strategy of 2013. However, much that follows in this response and the reply to the questions posed will be at odds with the Draft Plan's intention that the Borough should meet the directive on the 'target' number of dwellings determined by the Ministry of Housing Communities and Local Government.

Summary

This Council is dismayed that the Draft Plan of 2020 provides for the excessive increases in the population and number of houses to be built over the Plan period 2020 -2038. We cannot agree to this as the projections by ONS do not support the increase planned for. Adopting the proposals in the Draft Plan results in substantial incursions into the Green Belt, including sites on the edges of Berkhamsted¹, with adverse impact on parts of the AONB.

To restate much of our reply to the 2017 Reg18 'consultation', future development of Berkhamsted should be consistent with the Core Strategy [2006 – 2031] adopted as recently as September 2013. The house building rates and the Green Belt releases around the market towns that were suggested in some options (*to the 2017 proposals*) 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 notwithstanding what is asserted in the Draft Plan. The Core Strategy must carry significant weight in the development of the Local Plan.

We note the Statement by the Minister of State Robert Jenrick of 16th December 2020 on the recent consultation (Changes to the Planning System Aug 2020) :

"There were many consultation responses which did not fully recognise that the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for housing in an area. It is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It is crucial that planning is more certain and more transparent, so we will explore how we can make this clearer through our longer-term planning reforms, including considering the right name for this approach.

There is widespread support for ensuring enough homes are built across England to ensure the needs of our communities are met. We heard clearly through the consultation that the building of these homes should not come at expense of harming our precious

¹ The Draft Plan refers Berkhamsted with Northchurch

green spaces. We also heard views that this need can be better met in existing urban areas.”

This conflicts with the proposed releases of Green Belt in the Draft Plan to meet the proposed allocation of housing, especially on the edge of the major settlements, across the Borough.

Moreover, in a letter from the Department of Communities and Local Government, dated June 2016, the then 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 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.

We note that the urban capacity of Hemel Hempstead has been revisited in light of recent statements from central government on the opportunity to increase building heights in suitable locations. We ask whether enough weight has been given to the prospective changes to town centres following the COVID19 crisis with many premises likely to be converted to include dwellings. 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 have been 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. Notwithstanding, contributions from Developers’ S106 and CIL will not meet the full cost of investment in local infrastructure: that will require new Government funding without which residents will continue to suffer the adverse effects of infrastructure deficits.

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.”

It is manifestly the case that the infrastructure of Berkhamsted is not fit for purpose in relation to current needs let alone any future housing development of the scale proposed by this Plan.

We refer in particular to:

Town Centre Junctions and congestion; with only one crossing in the town centre, HCC transport studies are clear there is no scope for new roads or widening in central Berkhamsted. The traffic lights perform at ‘over capacity’ at busy periods.

Water and Sewage capacity; with the need to maintain the unique chalk streams in the area, the Environment Agency has capped abstraction from the local aquifer at current levels. The Sustainable Assessment identifies the need for additional capacity for the Borough as early as 2031.

Medical and Social Care; the Plan makes no provision for additional local GP services, nor for Social or Dementia Care in Berkhamsted. We recognize that these services are not the remit of the Planning Authority but adequate and sound Public Health provision must not fall between the cracks of HCC/CCG/PHE.

Schools; we note the potential provision of new Primary Schools , while a new 6FE Secondary School is posited on Site BK 06 in Northchurch. Capital Funding to build the school is unlikely to be sourced from a single development: additional revenue funding will be needed until its roll can attract funding to be sustainable. This must be identified in the IDP.

Infrastructure Development Plan; the Draft Plan references ‘Masterplans’ to guide development of major sites. Notable for their absence are proposals that link or integrate the sites with the host community viz roads/walking/cycling/footpaths together with prospective costs which must be included in the respective IDP.

Comments on the Consultation Questions follow below.