



Question 1

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

NO

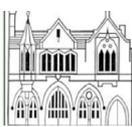
- Development on Green Belt cannot offer any net “environmental enhancements”, the net effect can only be negative regardless of size and the larger the development the greater the negative effect.
- Increased population would only help support the existing local economy if growth is focused within easy 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 previous inspections.**
- We do not agree with the conclusions made for the ‘Rejected Options’ in particular the Urban Capacity option (see Q16) and exporting growth to another council, specifically St Albans who wish to expand Hemel Hempstead without that expansion counting towards Dacorum’s numbers (see Q2)
- The cumulative effects of developments have not been assessed thus undermining any conclusions made.
- 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.
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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 key issue in 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 housing target from Gorhambury development should be included in this plan. Developments in Watford, Three Rivers, and Aylesbury Vale also need to be taken into account when looking at the overall picture.
- 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. We should also be aware of the developments in all surrounding local authorities including Watford and Three Rivers.



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 or open-mind. For example, a report highlighting the flaws in the Green Belt Stage 1 report (see Q9). This report was accepted by Berkhamsted Town Council and submitted to DBC. Subsequently, problems were highlighted with the second stage of the Green Belt Review, but none of the input offered on either occasion has been considered. Conversely, within the body of this consultation document and the supporting evidence, landowner/development public relations propaganda has been used as factual proof of benefits that will be delivered with development.
- A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be 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 so this site should be reserved for potential future health uses.

Question 4

Do you agree with the suggested vision for the Borough?

No – it's pie in the sky

- The vision is far removed from reality. For example, 'towns and villages have sufficient water supply' (water is one of the major issues and can only be exacerbated by proposed development options) and 'access to the Watford Health Campus is improved' (the new road has had almost no impact on the realities of travelling to the hospital).



- 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.
- We have in Dacorum a USP of two irreplaceable water courses, the Grand Union Canal and the Bourne rivers. It is proposed that there is substantial development along the banks of the Grand Union Canal which would completely destroy its ethos as a linear green park running through our authority. The intention to develop the banks of the canal is against DBC's policies to respect our industrial heritage and to promote tourism.
- Disagree that the Watford Health Campus is an appropriate/adequate 'vision' for the health care aspirations of Dacorum.
- Elderly care has been omitted from the vision. We also **have no urgent care facility**.
- It has long been accepted that we need a new hospital for this area.

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 this new plan does not, and the proposals will not deliver!

Question 6

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

Yes

- Strongly agree – all options should be robustly measured against these objectives. It is impossible to improve Berkhamsted's transport system with our topography.
- The 6th bullet point of "Sustainable Development should read: To conserve and enhance the function and character of the towns, villages and countryside.
- Both Berkhamsted and Tring have enjoyed excellent character studies prepared by DBC, the objectives of the new local plan totally ignore these excellent and perceptive documents, which took a great deal of time and money for DBC to produce and they should not be ignored.
- 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

- Policies identified are crucial – all options should be measured against them. We need to make sure that supplementary planning guidance is adhered to, particularly our character appraisals.

Question 8

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

No

- Agree with the proposed approach – especially that Berkhamsted should continue to meet the qualities identified in Q5. Unfortunately, the options identified in section 10 fail to do this.
- 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. Infrastructure always lags development and in some instances, such as road improvements to ease congestion, cannot be achieved given existing topographic 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.
- 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.
- We will have achieved target by 2020 – so we are ahead of our build rate – want us to continue at 73 pa rather than 47

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 the stages of the Green Belt Review are deeply flawed as highlighted in correspondence to DBC for Stage 2 and within the 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 Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence, this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.
- The Inspector's report [July 2013] records “. 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.

Question 11

Do you agree with the proposed approach to selecting sites?

No



- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006 – 2031) could not be sustained on infrastructure grounds.
- The current household build rate per annum in Berkhamsted is nearly twice that targeted, so that at the current rate the estimated target capacity will be deployed by 2020 – 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 development numbers and site options
- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure would apply (indeed to a greater amount) to substantial sites being promoted in the Market Towns of Berkhamsted and Tring.
- Strongly support development of brownfield sites before Green Belt sites are considered, however this objective is consistently contradicted/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!).
- Inclusion of higher density developments in appropriate areas of Hemel is not addressed in any detail in the proposed approach. More emphasis on taller buildings in appropriate areas will reduce the pressure on Green Belt but only if it is considered fully before the easy option of Green Belt release. 117 windfall developments are equivalent to a large site.

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

- Nothing has changed since the 2012 enquiry. Key Transport Issues (5.5.2) ignores the fact that people will not walk/cycle to the proposed Berkhamsted developments. We must not forget that each new property built entails six new car movements per unit per day (TRICS numbers). Our roads cannot handle this and as a linear valley town we have no opportunity to build more roads
- 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 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. There is no bus service hence mobility will generally be by motor car adding to worsening air quality in the town centre.
Nothing has changed since the 2012 enquiry. The Section on Key Transport Issues (5.5.2) ignores the fact that people will not walk/cycle to the proposed Berkhamsted developments.
- The significance of the Local Transport Plan, which encourages the use of walking and cycling, for edge-of-town developments, needs to be emphasised.

Question 13

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

Yes

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. But you do not mention using the accepted local vernacular. Design needs to take into account the new CCB report already referred to. The local vernacular as referred to in our character studies needs to be acknowledged.

Question 14

Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix a)?

Yes

- Hard to 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 made about sites. However, we have seen in so many recent cases that local policies are not adhered to. I would mention here again the excellent character appraisals prepared by DBC which are not being adhered to.



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

- 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, as should the developments that already have planning permission but have not yet been built.
- 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?

D) 476 Urban Capacity with a figure of less than 602 as per the Government's draft figure

- The starting point should be the Urban Capacity that doesn't require any Green Belt release
- The figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release and proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- DBC figures ignore the major extension to East Hemel 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.
- 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically 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 punish 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.



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 35% - 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

Question 18

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

Yes but

- Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills.
- Para 6.3.26 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. The provision and its phasing should be reconsidered
- 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.
- Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in plans. (SMA percentages)



Question 19

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

No

- Agree brownfield sites must 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 small effect but when combined they become unbearably large for towns like Berkhamsted
- Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / 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 and as such 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?

No

- Agree should cover similar area – BUT there is no mention of proximity to London and fast train routes. Housing Market Area is significant commuter area for London – how is this addressed?

Question 21

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

No

- As per Q20 – how is commuting addressed in the figures. Building additional houses for commuters and exporting work needs is not mentioned. Also, we note that residential homes are being built in the Maylands industrial area thus precluding that space for inward investment and therefore potential local employment.



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 Green Belt in anticipation of 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 and proven.

Question 23

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

Yes but

- We are not convinced DBC understand the area. M&S Berkhamsted is not 'out of centre'
- Agree retail development should be focused on Berkhamsted town centre to retain economic viability and character of this thriving market town
- However, proposed retail development at Gossoms End (Lidl) will extend retail centre along valley floor and is likely to achieve saturation of the supermarket provision in the town, while causing major congestion and pollution in an already polluted area. There appears to be no plan to mitigate this.
- Any plans for additional supermarket space either in the centre or at 'local centres' should be discouraged if the vitality of the town as a community centre is to be continued.
- 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
- When Tesco wanted to develop Stag Lane some years ago DBC vociferously argued for only town centre shopping developments, what has led to this change of tune?

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 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.

- Given the degree of traffic congestion in the town centres (esp. Berkhamsted), there will come a time when tourists will find that the town is an experience to be endured rather than enjoyed.
- The jewel in the crown of the whole of Dacorum is the historic Victorian waterway (Grand Union Canal) running as the backbone of our local authority. Instead of respecting this irreplaceable asset the banks are being built upon, instead of enhancing this historic green linear park, if building is allowed to continue, it will become a concrete jungle and no longer a major tourism asset, and our industrial waterway history will be lost for future generations. DBC is ignoring its own important policies for the waterway.

Question 25

Do you support the proposed approach to the natural environment?

No

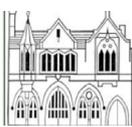
- Ecological corridors need to be protected. Building towards the edge of A41 will have adverse effects and drive wildlife out. This needs to be more clearly addressed.
- Removal of Green Belt for building does not enhance the 'Green Infrastructure'
- Reference to Cumulative Impacts of Development on the Chilterns AONB, Chilterns Conservation Board, should be made.
- The section is silent on protecting the integrity of the Chalk Streams, waterways, and aquifer, [referred to in 8.3.9].

Question 26

Do you support the proposed approach to the historic environment?

No

- Historic environment should encompass historic towns such as Berkhamsted – identifying limited Conservation Areas whilst destroying the surrounding environment will have detrimental effects on the town as a whole and its contribution to the goal of increased tourism. Also, as commented in Question 24 the canal is an important historic asset with priceless and irreplaceable industrial archaeological value.
- 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 recommended 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 with a flood risk. Actions are not following policies and ameliorating actions are in most cases inadequate e.g. Green Travel Plans.
- Many trees are being lost as a result of present ongoing development and more will be lost as a result of what is proposed, thus not only degrading our visual amenity, but reducing their proven beneficial effect of removing toxins from our environment.

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

- 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 the A41
 - also increased traffic generation in Berkhamsted town centre and congestion on A4251 caused by large sites on ridge tops and at a distance from the town centre converging on the retail and service sector of the town
 - threatens ancient woodland rather than planting more trees which would actually help reduce the impacts of climate change
 - Town centre street trees have been lost and not replaced, thus depriving residents of the beneficial effects of the absorption of aerial pollutants. Street trees also have considerable visual benefits.
 - 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.
- 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. (See P12 of BRAG statement to Independent Examination).
- Water and sewerage – problems identified P12 BRAG statement to Independent Examination
- Assumption made that various providers can meet demand without substantive evidence
- Proposed public transport options for proposed sites are not feasible

Question 30

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

No

- **Education**
 - The capacity of Ashlyn's School, a listed building in the Green Belt, is likely to be binding constraint if secondary school pupils are not to be bussed out of town. No site for another secondary school in Berkhamsted is available.
 - that facilities can be expanded, or new facilities built over-optimistic – for example Ashlyns School is nearing capacity but another secondary school in Berkhamsted would be unviable, site appraisals frequently state that they will enable the provision of school places and this is totally unrealistic
- **Health**
 - Local Urgent Care facilities have removed from the Hemel Hempstead site
- 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



- We are concerned that 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 relatively higher build rate.
 - in Hemel Hempstead – not addressed
 - Mental Health service omitted entirely
 - Dementia care not addressed
 - Care of the elderly in the community not addressed
 -
- **Community Facilities**
 - Hemel Hempstead's concept of neighbourhoods is appropriate – 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 suggested local centres.
 - It is vital that the existing community facilities so importantly situated at the centre of the town continue to be supported for the well-being of residents
 - 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
 - The youth facilities in Berkhamsted are not well supported by Borough and County, whereas in Hemel they are well supported.

Question 31

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

No

- Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply
- Concreting over a large area and providing a play area or pitch does not constitute providing open space
- Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions
- It has been long accepted that Berkhamsted has too little green space within its boundaries. We cannot afford to lose any more.
- It has already been suggested that a number of green spaces within the town are grass-creted over to provide parking, thus reducing even further our inadequate green space.



Question 32

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

Yes but

- 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 and underlines the lack of importance the local authority gives to this which is totally unacceptable. It will cause further degradation of the health and wellbeing of the community, which in turn creates extra costs for the LA. This epitomises short termism.
- CIL and S106 will not in themselves provide enough revenue for the required new infrastructure. There is already an infrastructure deficit in the town. We would like to see some concrete estimates of infrastructure costs (as identified presumably in the Infrastructure Development Plan), to cover accumulated deficit to date and the need arising from the development options.
- We are concerned that 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 relatively higher build rate.
-

Question 33

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

No

- See Q 16

Question 34

Do you agree with the rejection of the following growth levels:

No

- See Q 16



Question 35

Has the Council considered all reasonable alternative levels of growth?

Yes but

- Have not considered the rejected options properly. See Q16
- See Q16. Lower figures which could be sustainable and achievable within identified constraints should be explored. The exercise as currently conceived puts the “cart before the horse”.

Question 36

Do you support the proposed locational principles?

No

- Other sections of this consultation suggest that to support the 5-year housing land supply would immediately require Green Belt releases. Obviously 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:

No

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 are 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 to support their viability.

Question 38

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

No

Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints and needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful as outlined in question 36. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits.

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

Inspectors report July 2013

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.



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?

Yes

- This is the best of the options offered and concentrates the growth on Hemel Hempstead which as a new town is far better equipped/ designed to grow. Forcing massive growth on the Market Towns is not acceptable given the infrastructure limitations and would destroy their unique nature. However, we understand that this could threaten the Sunnyside Rural Trust in its Hemel Hempstead location which would be to lose not only such an important community resource but also unique employment opportunities for adults with learning difficulties in the borough.

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 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 45**

- ***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 46

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

Yes



General Comment:

Suggestion throughout that provision of housing “could help the local economy and encourage provision of local services” and that development of sites “could help to maintain community vibrancy and vitality” totally ignores the topography of the town. More houses are likely to mean quite the opposite with increased congestion, reduction in commercial viability of the existing commercial and retail centre of the town, a diminished attraction to tourists and a change from a successful vibrant market town to a soulless commuter enclave with little community cohesion.....

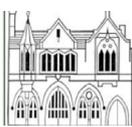
Proposed Approaches are set out – and then ignored in the selection of sites for development

There are several issues that have not been addressed before sites are identified –

- DBC list of suggested policies for the new Local Plan needs to be fleshed out before sites can be judged against them
- Highways – LTP needs to be published to analyse in detail any proposals
- Flooding – SFRA not completed
- Air pollution is not addressed

Below are the exact comments we made to the 2008 consultation and actually, very little has changed –

- ♣ Future development of Berkhamsted should be Plan led and be driven by the needs of the local community.
- ♣ Status of Supplementary Planning Guidelines should be enhanced.
- ♣ Action needed to protect and enhance the waterside environment.
- ♣ The infrastructure of the Town is not fit for purpose in relation to current needs let alone any future housing development.
- ♣ Lack of community facilities for the young and old alike identified as one of the most important issues facing Berkhamsted.
- ♣ Our open spaces are in need of protection from infill developments both on public and privately-owned land.
- ♣ Protection of wildlife corridors should form an important part of any assessment of housing site suitability.



KEY PRINCIPLES

We feel it essential however that any consideration of these options is placed in the broader context of what we see as some essential principles which should guide the development of Berkhamsted in the next twenty years or so. These principles embrace the issues which confront Berkhamsted at present which must inevitably inform our priorities for the future.

1. PLAN LED DEVELOPMENT

We feel strongly that any future development of Berkhamsted should be Plan Led i.e. occur against the backcloth of an overall development strategy for the town rather than follow a piecemeal approach. In short, what do we want Berkhamsted to look like in twenty years' time? What sort of place do we want our children to inherit and what would we be proud to have developed. This means that any housing development should be set within the context of an overall development plan which meets the broader aspirations of the community and addresses some of the issues which we face on this broader front. Our concern is that, in the absence of an overall Plan, development will merely exacerbate the problems which exist already and impact negatively on our quality of life and prove unsustainable.

2. COMMUNITY NEEDS DRIVEN

It follows also that any future development of Berkhamsted should be driven by the needs of the local community and address those issues identified by the community as important. "Local Planning Authorities should develop a shared vision with their local communities of the type(s) of residential environments they wish to see and develop design policies that set out the quality of development that will be expected for the local area, aimed at creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character." (PPS 3 para 14) Many of these needs are identified below and form an important backcloth against which any future development should be assessed.

3. THE CHARACTER OF THE TOWN

"Any new development should create, or enhance a distinctive character that relates well to the surroundings and supports a sense of local pride and civic identity". (PPS 3) Berkhamsted's distinctive character and identity is that of being a market town set in beautiful countryside. It follows that any new development should be assessed according to its impact on the character of Berkhamsted and its setting.

A. The Rural Surrounds and Gateway

While there is a shortage of open space and greenery in the Town, the North and West of Berkhamsted border the statutory Area of Outstanding Natural part of the statutory AONB, nevertheless contribute to Berkhamsted's intrinsic character and provide a naturally green gateway to the Town. These areas are vitally important to the envelope perspective when they are viewed from either side of the hillscape.



Indeed, this Green perspective was thought to be so important that when the A41 by pass was constructed it was sunk and cut through the hillside so as to be invisible from across the valley. This envelope view and the gradual progression from an urban to rural landscape should be retained as an important feature of our landscape. This progression from urban to rural is recognised in the current local plan by a move away from high to low density housing as we progress from town to our semi-rural borders. The impact of proposed sites on the rural gateway to Berkhamsted, AONB and our semi-rural environment thus forms an important part of our assessment.

We note that in the Dacorum Landscape Character Assessment the areas to the South and West of the town are identified as constituting the "Ashlyns and Wigginton Plateau" whose key characteristics consist of a gently undulating plateau, parkland, grassland and ley crops and extensive mixed woodland. The recommendation of the Landscape Assessment (which is currently Supplementary Planning Guidance) is to "improve and preserve" this zone.. Dacorum is one of the few Local Authorities to have detailed character and landscape area assessments. We feel these are integral to preserving the character of our Town. We believe therefore, that, in the new planning climate the status of Supplementary Planning Guidelines should be enhanced and that they should be afforded the same status as Local Policies by ensuring the appropriate level of consultation in their formulation. To this effect we recommend that they be incorporated within those policies so far as is possible, recognising that a balance will need to be struck between the detail specified in a policy and its inclusion in a Core Policy, the latter requiring a higher level of generality and SPG for specific areas.

B. The Conservation Area within

Turning to the Town itself much of Berkhamsted is within a designated Conservation Area characterised by state of the art Victorian and Edwardian architecture. Again, any new development should be assessed within this context and should either preserve or enhance the character of the Townscape as well as existing community facilities.

The Grand Union Canal is of the utmost importance to the heritage of Berkhamsted from both an historical (home of Bridgewater the innovator of the canal system) leisure and scenic perspective. It was an artery of trade, now largely leisure, employment and wealth offering huge economic, social and environmental benefits. We would like to see the waterside environment more sensitively integrated with the community needs and aspirations for the town than has been the case in the past. We place emphasis on protecting and enhancing the waterside environment as a unique asset to the people of our market town and tourists who enjoy the facility.

You have extended the Conservation Area within the Local Development Framework for which we are extremely grateful, but it does need tighter control from enforcement. We would welcome a review of Article 4(2) directions that were introduced in 1994 by Government directive to stop developments which might adversely affect the external appearance of properties –doors, roofs, frontages etc.

4. INFRASTRUCTURE

Any further housing provision should take into account an assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required. (PPS 3) The infrastructure of the Town is not fit for purpose in relation to current needs let alone any future housing development. Utilities such as electricity and sewage



capacity are under constant pressure as evidenced by power cuts and raw sewage which is not an uncommon phenomenon in Bank Mill Lane, the High Street, London Road or even Coppins Close. Our roads are permanently congested with the parked cars of both residents and commuters. Many are unsuitable for heavy traffic and public transport. Our high street is the only focal point for shopping and is now under severe strain from increased through traffic and inadequate parking space. Any solution to these problems will require significant investment. In our view, these problems need urgent attention now. What then will be the impact of any new development? We recommend that, if it is necessary to allow any future housing provision in the town, this should be phased in such a way as to require that any necessary infrastructure should be provided before such developments are permitted to take place.

5. TRANSPORT, CARS, CYCLES AND PEDESTRIANS

The geography of Berkhamsted, situated as it in the Bulbourne valley with steep hills to the North and South sides of the town, encourages the use of cars to access the Town Centre. Given the current problems of traffic congestion, pollution and the inadequacy of parking facilities, any development should be assessed against its implications for car usage to access the high street on a regular basis New development should encourage walking and cycling and discourage car usage in line with sustainability guidelines. Any new development would have to be self-supporting in terms of infrastructure and its implications for Berkhamsted as a whole critically assessed given the issues which exist already.

6. COMMUNITY AND SOCIAL FACILITIES

In addition to the existence and provision of adequate infrastructure an important principle of the new housing strategy is to “ensure that housing is developed in suitable locations which offer a range of community facilities and Key services “(PPS3) Participants of the Berkhamsted Place Workshop identified the lack of community facilities for the young and old alike as one of the most important issues facing Berkhamsted. There was also deep concern about the shortage of primary school places and educational facilities more generally.

These issues were seen as being of high priority for a new Local Development Framework. Again, the volume and location of any new housing provision must be assessed against the present inadequacy of facilities, their location and future requirements.

7. OPEN SPACE

Berkhamsted is notable for its lack of open space and greenery and what we have is increasingly dependent on private gardens. We feel strongly that our open spaces are in need of protection from infill developments and that the provision of open and green space should be an integral part of any proposals to develop Berkhamsted further. In the light of sites which have been approved for development already we note here that any new development should provide or enable “good access to, community, and green and open amenity and recreational space (including play space) as well as private outdoor space such as residential gardens.....” (PPS 3) The Dacorum Open Space Study [Sept 2007] found the amount of leisure space deficiency in Berkhamsted at prevailing population levels was 16.75 ha, the largest shortfall in the Borough.



8. INFILLING

We feel strongly that our gardens in particular are in need of protection from infill developments. We would welcome a specific statement in the Local Plan which recognises that gardens are as important as other forms of green space insofar as development is concerned. There should be separate policies for residential (often windfall) developments and non-residential Brownfield site developments as identified by Dacorum for which we are informed there is scope within the new planning framework. We would encourage Dacorum to adopt separate policies for residential brownfield land which would effectively restrict, and in some cases, prohibit, new housing development on such sites.

These Policies would contain some of the following important elements:

- ♣ remove the need to maximise the use of land in residential gardens e.g. by not amalgamating gardens into larger units
- ♣ emphasis on the need to consult with neighbours before developers bring forward proposals
- ♣ prevent pre-application tree felling by more extensive use of TPO's and ecological surveys
- ♣ set low density figures and stick to them in determining planning decisions
- ♣ importance of design compatibility with adjoining properties
- ♣ infrastructure suitability

The adoption of such policies would recognise the important role which gardens increasingly play in providing green space and their contribution to ecological development and biodiversity. Many biodiversity corridors run through private gardens.

9. BIODIVERSITY

Policy 96 of the Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local 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 has been carried out in preparation for the Local Development Framework by Herts. Biological Research Centre [2006]. In addition to identifying major Biodiversity Sites, the work has identified important Biodiversity Corridors. While we appreciate that such sites and corridors are not protected by statute we feel their protection should form an important part of any assessment of housing site suitability as should the protection of 'Wildspace' more generally given its rapidly disappearing availability in Berkhamsted. The constant removal of local habitat and resources is degrading and removing the ability for biodiversity to function ecologically within the urban environment and this is of grave concern.

The Citizens had a visioning evening which informed our response to the consultation – please look at the web site, where you will see a short film of the event which gives a very good feel of the opinions of the 130 citizens that were there. There are also some tables which give all the notes taken during the discussions.

Citizens were also concerned that no mention is made of the developments that already have planning permission, or the developments on our borders that will create many more car movements using Berkhamsted roads, there are 1150 on the Potton End side of Old Hemel and 350 behind Piccots End which will create 9000 car movements a day which will probably use Berkhamsted Railway station and shopping area.



We have not responded to the individual sites on offer within Berkhamsted as we feel that Berkhamsted cannot take anymore development for the reasons given in the answers to the questions above. The overall question that has to be asked is ...

Where is the necessary infrastructure?

Here is the link to the web site which forms part of our response to the Issues and Options Consultation and the short film needs to be watched and the documents read along with this document as part of our response.

<http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/>