



# **BERKHAMSTED CITIZENS**

**BERKHAMSTED CITIZENS ASSOCIATION**

**RESPONSE TO  
DRAFT REG 18 LOCAL PLAN 2020**

**DACORUM BOROUGH COUNCIL  
CONSULTATION**

**27 November 2020 to 28 February 2021**

**Before embarking on our response to the draft Local Plan, we would like to say that we feel not enough opportunity has been given to a large section of the community which could not access the IT version of the consultation. As a result of Covid 19, the community could not access the library, the Forum, or Victoria Hall, as such an outing would not have been designated as essential by HMG. Therefore, we feel that the consultation could be regarded as invalid.**

### **Introduction**

This document has been prepared by a working party of a number of locally concerned participants who have all contributed to this response.

All 'vision' statements are inevitably framed with positive language around well-meaning, if platitudinous, sentiments. The 'Overarching Vision for Dacorum's Growth by 2038' is no different with grand statements claiming improvements will be achieved relating to Environmental Sustainability, Economic Growth and Health and Wellbeing.

However, much of the plan under consultation works directly against those aspirations, particularly for the two historic market towns of **Berkhamsted** and **Tring** and the area between Old Hemel, Piccots End and Potten End.

### **The Draft Plan**

We responded in depth to the 2017 Draft Plan, regulation 18, and received no regulation 19. This time we look forward to your response.

We strongly disagree with 'The Vision for Dacorum's Places' relating to Berkhamsted. The proposed growth is obviously too much for the town. With circa 500 dwellings planned in Northchurch Parish (aka West Berkhamsted at DBC planning) and around 1700 in Berkhamsted, this equates to a 24% increase in dwellings and a massive 31% growth of the urban footprint (Google Earth used for calculations), most of which is located within sensitive ridge top locations in Green Belt.

We note that the 2013 Core Strategy vision of *“maintaining the strong valley and linear character of the settlement”* has now been emphatically dumped. Where previously the Council asserted that *“The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported”* (and put this argument strongly to the Planning Inspector), DBC now promote the land for removal from Green Belt and suggests that development can now be built *“in a way that takes account of sensitive views and landscape”*.

The plan removes green belt areas that have become and are becoming increasingly popular walking/rambling routes and provide easy access to the wider countryside. Removing these areas will further increase the need to travel for recreational walking/hiking/running purposes. Over the pandemic residents have not flocked to the likes of Velvet Lawn to do laps of a sports' field, but rather the immediate and wider countryside which is greatly valued by our residents. Its loss will inevitably lead to an increase in mental health problems as evidenced by research. It has been found that green space protects against mood disorders, depression, neurotic behaviour, and stress-related issues.. The effect of green space is also dose-dependent, meaning those who have longer exposures to green space have greater mental health benefits.

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 our replies to the questions posed will be very much 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

We are horrified by the Draft Plan 2020 which 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 Berkhamsted<sup>1</sup>, with adverse impact on parts of the AONB. The impact of Covid 19, will mean that large numbers of shops and office premises will be asking for change of use to residential, this has not been taken into account.

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 16<sup>th</sup> 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*

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<sup>1</sup> The Draft Plan refers Berkhamsted with Northchurch

*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 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.**”*

**YOU 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.***

There are many examples that could be used, but we have limited ourselves to highlighting just six examples of guidance issued by Central Government that shows the policy on Green Belt protection is clear and unambiguous:

- 1) The NPPF provides protection for Green Belt and the land due to be released around Berkhamsted clearly pass the tests.
- 2) In June 2016, the Minister of State for Housing and Planning wrote a letter to MPs confirming “demand for housing alone will not change Green Belt boundaries”.
- 3) Paragraph 9 of the 2017 DCLG “Planning for the right homes in the right places: consultation proposals” states that “Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”
- 4) On December 16<sup>th</sup> 2020 the Government published a response to the recent white paper consultations. With reference to protected landscapes and Green Belt it states, “We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.”
- 5) The same response goes on to state “We can and must strive to build more homes, but to do so with sensitivity and

care for the environment, heritage and the character of existing communities.”

- 6) It further clarifies “Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and 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 does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.”

DBC’s sole justification for accepting Government’s numbers (922dpa) as a strict target is simply that “*Any option below the standard methodology would have to be robustly justified*” (paragraph 5.8 of The Development Strategy Background Topic Paper).

Given that Government has made it clear the numbers are NOT targets and Green Belt should be afforded the highest protection, we fail to understand why DBC Planning felt unable or unwilling to make a case that can be “*robustly justified*”.

Indeed, the 2013 Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting”, but the new retrofit Borough Vision fails to reflect any of this.

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 question 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.

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 Draft 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 on the next pages.

## **RESPONSE to REG 18 Draft Local Plan**

### **Vision and Strategic Objectives**

#### **Question 1:**

***Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough?***

#### **1.A NO**

We note the comment in Para 1.28 and 1.29 on page 9 of the draft Plan:

**1.28** The Local Plan has been prepared in accordance with current Government guidance. To be found "sound" the Local Plan needs to comply with the NPPF, specifically paragraph 35, which requires Plans are:

- a. **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

**1.29** However, we are a very constrained area with significant amounts of our Borough in the Green Belt. We also have a considerable amount of high quality landscape as part of the Chilterns Area of Outstanding Natural Beauty (AONB), which is a national landscape designation shared only by relatively few other authorities across the country. We are also home to parts of the Chilterns Beechwoods Special Area of Conservation (SAC) which is an ecological site of international importance. These are significant constraints which influence the locations for new development in the Borough.

The subsequent comments serve to alight on the numbers designated [SP2] 16,596 dwellings (viz 922 pa) over the Plan period 2020 – 2038. We remain unconvinced that this number (nor the 1023 pa) should be adopted for the Plan Period given that ONS projections based on 2018 data indicates the

annual need is around 350 dwellings pa. Moreover, this contrasts with the current Adopted Plan (Core Strategy 2013 – 2036) that settled on 430 pa.

Starting from a premise that is suspect and therefore contentious, the overarching Vision is thus undermined or at least questionable; the prospective high build rate will adversely impact the principal urban centers and especially the unwarranted loss of swathes of Green Belt, including around Berkhamsted/Northchurch/Tring, that are designated in the Draft Local Plan as 'Growth Areas'.

Further discussion on the matter is set out in Q 7

**1. B**

This section relates to proposals set for Berkhamsted and Northchurch [considered in the Draft Local Plan as West Berkhamsted]: over the planned period 2200 dwellings are scheduled [SP2- 3b] of which around 500 are in Northchurch Parish and 1700 in Berkhamsted. This equates to a substantial increase in the number of dwellings in Berkhamsted/Northchurch of around 24% - over the 18-year Plan period and where most of the designated sites are currently in the Green Belt at some distance (3 – 4 km) from the town centre and station at the top of steep valley sides. We cannot see how new housing developments at this distance (and difference in elevation) from main services infrastructure can be considered as "sustainable".

As recognised in Para 23.119 [Page 225] the Town experiences a high level of congestion:

**23.119** As a settlement area, the County Council consider that Berkhamsted already has a sustainable transport network in place. There is an excellent mainline railway service to London and the town forms part of a key inter-urban Aylesbury-Hemel-Watford bus route. However, they identify congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.

The following paragraph says: “there are few opportunities for new road capacity in the town”. As a town set in a valley with only one main crossing the county’s engineers comment the traffic lights already operate at over capacity. This results in residents choosing to avoid the main roads in the town centre or travelling to shop elsewhere.

The Draft Plan continues:

**23.121** Given their ‘edge of town’ locations, the strategic Growth Areas will need to focus on ensuring they are well connected, accessible to the town centre and railway station, and public and sustainable transport options are enhanced. All Growth Areas will be required to provide for on and off-site measures to alleviate local highway problems.

The last sentence is an aspiration without a foundation to support it: The Plan offers no substantive detail that necessary strategic infrastructure or sustainable transport options, to provide access to the town centre and station, from the proposed development sites, other than by car, have been planned for.

The referenced ‘Berkhamsted and Tring Sustainable Transport Strategy’ [Para 23.122] is nothing of the sort, mapping as it does junction enhancements at relatively minor side roads and crossings within the urban area and new/widened footpaths along Shootersway. In the absence of a well-considered Strategic Transport Plan that addresses the critical issues, and its inclusion in the Infrastructure Development Plan, We do not support this Draft Plan to accommodate the Sites designated.

## The Sustainable Development Strategy

### Question 2:

### ***Do you have specific comments about the Sustainable Development Strategy?***

**Yes**

We consider the Housing Growth numbers in the Plan is based on flawed assumptions, we note the text in Para 5.3 – 5.5 [P30] :

- 5.3** The spatial strategy aims to deliver the significant uplift in growth in a sustainable way across the Borough, seeking out opportunities to regenerate Hemel Hempstead and to continue to act as a catalyst for its transformation. Elsewhere, we are looking to accommodate growth that supports the long term function of the towns and villages and that delivers sufficient growth to provide much needed investment in infrastructure. We know that we cannot accommodate all the growth within the urban area, so despite our approach to increasing densities and heights, we do need to release land in the Green Belt.
- 5.4** The strategy focuses growth in and around the most sustainable settlements in the Borough, principally Hemel Hempstead, Berkhamsted and Tring through utilising urban land as well as through extensions to each settlement. Hemel Hempstead's growth will be focused through much greater urban intensification reflecting the wider availability of development opportunities and the sustainability of the town and access to services, facilities and employment. The expansion of the town will be focused to the north and east of the Hemel Hempstead, with further land removed from the Green Belt to meet longer term needs.
- 5.5** The Growth Strategy for Berkhamsted and Tring will also seek to maximise urban capacity but will not pursue an urban intensification strategy that detracts from the character of these locations. Instead growth will be accommodated mainly through expansions to these settlements in a way that manages landscape and Green Belt impacts but also meets our aspirations for growth to be sustainably located close to passenger transport and other services, facilities and employment opportunities.

We acknowledge and welcome the statement "... but will not pursue an urban intensification strategy that detracts from the character of these locations." However there have been many householder planning applications where greater densification has eroded former Character Area guidance, hence becoming the new default.

The proposed release of Green Belt around Berkhamsted cannot be described as being '*sustainably located close to passenger transport and other services, facilities and employment opportunities*'.

**Policy SP2 – the strategic thrust of this policy (Spatial Strategy for Growth) is not supported** given that it is based on the contentious growth numbers.

We comment further at **5.A**

Policy SP2 – Spatial Strategy for Growth includes statement in 3 b.

- b. Berkhamsted will accommodate growth of at least 2,200 new homes. Development will enhance the town centre and strengthen its function as a key market town in the Borough and will provide significant new investment into sustainable transport initiatives, education, open space and sports facilities.

*The Adopted Core Strategy (2013-2036) para 6.2.8 identified capacity (not “need”) in Berkhamsted of 600. Only eight years later this statement indicates that Berkhamsted will have an additional 1600 homes imposed upon it.*

The Town Centre already suffers from congestion and suspect air quality, viz data for Lower Kings Road shows the level of NO<sub>2</sub> in some periods exceed the 40micrograms/cm<sup>3</sup> limit, albeit that the annual record does not show exceedances. In many respects at its current size and topography the Town has reached the limits of capacity as evidenced by traffic congestion, shortage of school places at primary and secondary levels, GP and associated services, sports facilities and in-town open space. We dispute that the substantial increase imposed on the Town will enhance the quality of life for residents current or future.

We welcome the sentiments of SP2. 4

4. Development that does not fit with the scale, distribution or requirements of this policy will not be permitted.

We have qualified support for SP2.5 with its comment on Neighbourhood Plans: additional growth may not be compatible with community aspirations for their locality.

### **Housing Land Supply**

**Table 2** [P37] shows 5945 houses being built on ‘Strategic greenfield Growth Areas’ viz Green Belt of which around 1870 are allocated to Berkhamsted. We have questioned whether these

can be considered 'sustainable sites'; the further critical issue is whether it is desirable to impose 20% plus growth on the locality that already has severe infrastructure limitations as well as being constrained by proximity to AONB, Beechwood SAC etc.

In so far as it applies to Berkhamsted, it does not endorse, SP4 – Delivering the Housing strategy

### **The Employment Strategy**

We note the absence of any commitment to preserve or improve local employment opportunities within or close to Berkhamsted. The Vision must include improved local provision and access to employment as a contribution to sustainability.

We note in Topic 15 Employment Development [P84] the localities with designated GEA and the two new ones Two Waters and Dunsley Farm, Tring. The Northbridge Road site in Berkhamsted although supported by an Article 4 directive, should also be designated as GEA to protect local employment.

We deplore the potential loss to housing development of the Berk11 Site [Jewson Site]. This site should be retained for employment.

### **Delivering Infrastructure (and IDP)**

We note the comments in section 10 and **SP7 Delivering Infrastructure**

SP7.3 references 'timely and comprehensive manner to support new development.'

We wish to avoid the scenario where the promised infrastructure is delayed and residents experience the resulting adverse impact. Accordingly, we consider a stronger statement is required that ensures provision is delivered ahead of the time when provision is regarded as overdue to meet the needs of the development.

## Guiding Development

### Question 3:

***Do you have specific comments about any of the Guiding Development policies?***

**Yes**

*Please provide your comments below and attach any supporting evidence.*

*Please indicate clearly which of the Guiding Development policies you are commenting on (please add extra pages if required)*

We welcome in particular the **Topic - Climate Change and Sustainability** and many of the comments included with these policies.

Para 17.9 refers to NPPF Chapter 14

- 17.9** Plans should be proactive in mitigating and adapting to climate taking into account a number of impacts including flood risk, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures (paragraph 149) The policies of the plan should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.

Water supply in this area is constrained being supplied by the local aquifer which also feeds our Chalk Streams. The Environment Agency tells us that abstraction is to be restricted to 'current' levels. This poses a challenge to the Infrastructure Plan and is a critical aspect of the proposal to increase dwelling numbers by over 20% in this locality. We comment further in Q6 Sustainability Appraisal.

Aside from 'climate change', with reduced rainfall, Residents will need assurance that the water supply is not threatened by the increased numbers.

We note **SP10 Climate Change Mitigation and Adaptation** applies primarily to new development. We are pleased that existing stock is not forgotten as policy 3.i applies viz:



- i. supporting retrofitting schemes to the existing building stock to meet higher energy efficiency standards.

The Plan makes references to the Borough's Climate Change Strategy: we commend its ambition as set out in Para 17.24 and 17.25 on non-residential development

**17.24** While the Government has signalled its intent to introduce a 'roadmap' to reducing greenhouse gas emissions to net-zero by 2050 - to include the Future Homes Standard in 2020 and further measures from 2025 for new homes to produce 75-80% lower CO<sub>2</sub> emissions and be 'zero carbon ready' - our Plan accelerates this change. Our initial energy efficiency standards for new residential development are set at exceeding the Building Regulations Part L 2013 by a further 19% in terms of CO<sub>2</sub> reductions on the Target Emission Rate (TER). This is the equivalent of the withdrawn Code for Sustainable Homes Level 4 and complies with the provisions of the Planning and Energy Act 2008. In addition we will seek contributions towards a further 20% reduction, leading to all new development being carbon neutral from 2030.

**17.25** The Plan expects new non-residential development (where local authorities are not restricted or limited in the setting of energy performance standards) to achieve a BREEAM standard of Excellent.

This is set out in:

**Policy DM23 - Energy and Carbon Emissions Reductions in New Development**

We also note the several statements and Policies relating to Community Heat and Energy Networks. These are an improvement on previous policies and should be retained. Sadly they seem to have never found acceptance by developers in this Borough.

## **The Delivery Strategies**

### **Question 4:**

***Do you have specific comments about any of the Delivery Strategies?***

**Yes**

### **Berkhamsted and West Berkhamsted/Northchurch**

The Chapter Berkhamsted Delivery Strategy p222 onwards.  
The context is set out in the following text from p224 of the Draft

Plan:

### Berkhamsted Homes

**23.104** At least 2,200 homes will be provided in Berkhamsted over the period 2020-2038.

**23.105** Not all of the housing required can be achieved within the town boundary as opportunities are limited, especially given its historic and densely built-up core and high townscape quality neighbourhoods. Some 400 homes will come forward in the settlement area through identified and windfall sites.

**23.106** A significant amount of future housing (around 1,870 homes) will be brought forward as urban extensions through the following strategic Growth Areas:

- Land south of Berkhamsted (850 homes)
- Haslam Fields, Shootersway (150 homes)
- British Film Institute site, Kingshill Way (90 homes)
- Land adjacent to Blegberry Gardens (80 homes)
- Rossway Farm (between Shootersway and A41) (200 homes)
- Land east of Darrs Lane (200 homes)
- Lock Field, New Road, Northchurch (60 homes)
- Land between Bank Mill Lane and London Road (50 homes)
- Land at and to the rear of Hanburys, Shootersway (70 homes)

**23.107** Further residential allocations are proposed within the urban area as follows:

- Former Durrants Furniture, Billet Lane (Jewson Site)
- Berkhamsted Civic Centre and land to the rear of High Street
- Land c/o Durrants Lane / Shootersway

**23.108** The bulk of development will chiefly be delivered as a planned new neighbourhood to the south and west of Berkhamsted. This broad location of growth will minimise the impact on the sensitive landscape surrounding the settlement, provide for a more balanced east-west growth to the town, and limit impact on the better performing Green Belt areas. The new neighbourhood will need to be sensitively designed given its proximity to the Chilterns AONB, including the retention and enhancement of landscaping and the careful siting and design of development given the neighbourhood's mainly valley-side/ridge line location.

In our comments to Q1, we have stated a number of issues that lead us to our position

As recognised in Para 23.119 [Page 225] the Town experiences a high level of congestion:

**23.119** As a settlement area, the County Council consider that Berkhamsted already has a sustainable transport network in place. There is an excellent mainline railway service to London and the town forms part of a key inter-urban Aylesbury-Hemel-Watford bus route. However, they identify congestion as a key challenge in Berkhamsted resulting in constrained roads, difficulties with bus movements, and limited cycling infrastructure.

The following paragraph says: "there are few opportunities for new road capacity in the town". As a town set in a valley with only one main crossing, the county's engineers

comment that the traffic lights already operate at over capacity, with residents choosing to avoid the main roads in the town centre or travelling to shop elsewhere. Alternative routes are unlikely to be capable of being widened without very costly investment.

The Draft Plan continues:

**23.121** Given their 'edge of town' locations, the strategic Growth Areas will need to focus on ensuring they are well connected, accessible to the town centre and railway station, and public and sustainable transport options are enhanced. All Growth Areas will be required to provide for on and off-site measures to alleviate local highway problems.

The last sentence is an aspiration without a foundation to support it: the Plan offers no substantive detail that necessary strategic infrastructure or sustainable transport options, to provide access to the town centre and station, from the proposed development sites, other than by car, have been planned for.

The referenced 'Berkhamsted and Tring Sustainable Transport Strategy' [Para 23.122] is nothing of the sort, mapping as it does junction enhancements at relatively minor side roads and crossings within the urban area and new/ widened footpaths along Shootersway.

We also note the paragraph that refers to the town being served by a "key inter-urban Aylesbury – Hemel – Watford bus route". Whilst the presence of said bus route – route 500 operated as a commercial service by Arriva - is correct, it operates at a frequency of 3 buses per hour on Monday-Friday, 2 buses per hour on Saturdays and 1 bus per hour on Sunday shopping hours. There is no evening service or early service on Saturdays. Due to its length, it also suffers from reliability issues. Despite fulfilling the criteria of a "good public transport service" in the Topic papers, there is the paucity of services in other directions from Berkhamsted. We do not agree that a sustainable transport network is in place in Berkhamsted.

We note [p228]

### Delivering Growth in South Berkhamsted

**23.129** The expansion of Berkhamsted to the South represents the single largest allocation in the town. When built out it will consist of a vibrant new neighbourhood of around 1,000 homes spread across several sites. It is the fact that growth will come forward on several sites which requires a cohesive approach which binds these elements together.

**23.130** The development will deliver socially inclusive communities, particularly genuinely affordable homes, sustainable energy infrastructure to address climate change (contributing to our response to the Climate Emergency and need for decarbonisation), create walkable neighbourhoods and enhanced cycling provision. There is a need to bring forward a Masterplan for the area which delivers the following:

The Policy SP21 [p229] states:

The Council will bring forward a comprehensively planned urban extensions to Berkhamsted in accordance with a Masterplan led approach and based on the Town and Country Planning Association (TCPA) Garden City Principles. The Masterplan will be prepared by the Council and adopted as an SPD working in collaboration with key partners and landowners and be subject to community and stakeholder involvement.

The Masterplan will be supported by Development Parcel Design Codes which will inform planning applications.

Given recent experiences of applications that bear no resemblance to Master Plans *[although adopted as SPD]* residents will remain wary of such assurances.

The Introduction to the topic [Chapter 23, p 189] asserts: "If this Draft Plan proceeds as set out, Berkhamsted residents will want to be assured that details for the key infrastructure needs to integrate the edge of town sites will be published prior to consultation on the Regulation 19 final plan."

The Appendix attached comments on the critical importance of planning road and transport links at the outset so that residents have easy access to convenient options other than using their car.

### West Berkhamsted

**23.134** Key issues/development requirements to be delivered and or addressed in West Berkhamsted:

- around 500 homes;

- primary schools;
- a new secondary school;
- a district heating network; and
- network of green spaces, including the delivery of Suitable Alternative Natural Greenspace (SANG) if required.

While residents are concerned about the shortage of school places at secondary level in particular, the sustainability and viability of the secondary school will be under great pressure for many years until pupil numbers attract the funding to sustain the level of staffing provision necessary to support the school. This has not been addressed in the Draft Plan or IDP.

It is manifest that transport movements will add to congestion on Shootersway while Darrs Lane, a narrow country lane, will require major investment to support the additional traffic. Increased traffic on Darrs Lane will also intensify congestion in Northchurch village centre.

## Proposals and Sites

### Question 5:

**Do you have specific comments about any of the Proposals and Sites?**

**Yes**

### **Hemel Hempstead**

**Growth Area HH02** Capacity 4,000. Identified for removal from Green Belt now. Should be included for development 2021-2038 rather than safeguarded.

**HH03** Hospital site. Should not be considered for redevelopment until a clear sustainable NHS strategy for this part of Hertfordshire (incl. Watford and St Albans) is confirmed and initiated.

**HH06** Civic Centre Site. Should be reserved for cultural uses to meet DBC promise to replace the Pavilion

### **Berkhamsted**

In general, the justification for including most of the Berkhamsted sites are a result of planners accepting the Central Government 'target' and claiming this as 'exceptional circumstances' despite a Central Government commitment to protecting the Green Belt. Most of these proposed allocations should be rejected. The weakness of infrastructure plans are highlighted elsewhere but for instance exactly how and by whom are the networks of new pedestrian links with adjacent allocations to be provided?

**Bk01** South Berkhamsted. Green Belt. The 'Exceptional Circumstances' justifying removal from Green Belt are not specified. The proposals repeat those put forward for, and rejected by the current Plan, 2010-2013. The arguments against development then are still valid. Infrastructure and sustainability provisions are weak, and how will Swing Gate Lane, already congested at certain times be kept as a 'secondary' access.

**See film made about this development for the last draft Local Plan.**

<http://www.deetv.tv/#south-berkhamsted-concept>

**Bk02** BFI Presumably the only reason this is included is because BFI have indicated they wish to move. Site specific requirements are a nonsense.

**Bk03** Haslam Field. Berkhamsted School has been an important part of the Town since 1541. BSGCA has reported that there is a shortage of pitches available to the community. Haslam Field was gifted to the school. If it is surplus to their current requirements it should be passed to BSGCA to use until it is no longer required when it would be returned to the school.

**Bk07 Lock Field Northchurch** Safe access to New Road will be a challenge given how narrow the road is beyond the Canal bridge. The site has previously been rejected for inclusion in the Core Strategy. The canal is a very important tourism asset within Berkhamsted and the Borough of Dacorum. Development should

not be countenanced along this priceless asset. Once lost it is gone for ever as green space and an important wild life corridor.

**Bk09** Bank Mill Lane. Green Belt and at the entrance to the Town. Contains the River Bulbourne. It is on the flood plain. It is an irreplaceable asset to our local green space.

**Bk11** Jewson. Provides premises for a number of local concerns serving the community's needs and employment. Replacement with residential dwellings is unthinkable and the idea demonstrates the lack of real understanding of the nature and employment needs of Berkhamsted.

**Bk12** Civic Centre. Redevelopment will see the departure of community facilities especially the hall from the Town (given Dacorum's track record on public facilities). Local community groups supported by the Town Council have an interest in a transfer as a Community Asset. Disposal by the Borough for development conflicts with Policy DM64 Community Facilities and DM 65 Community Stewardship and Management.

**Question 5A:**

**Are there any other sites that you think should be included in the Plan?**

**Yes**

We note the several comments throughout the Draft Plan that underpin the decision to distribute the housing allocations in the manner set out. This will result in very substantial additions to both the major settlements of Berkhamsted and Tring with extensive new releases of Green Belt to be designated as 'Growth Areas'. Although cogently set out in the Plan, neither towns' growth will be organic nor 'sustainable' – as local employment opportunities at the scale to match resident numbers does not exist and will lead to additional out-commuting.

Far better to locate new dwellings at scale closer to centres of industry and hence employment. For Dacorum, industry is concentrated in Maylands and the surrounding area.

We note the proposals for Hemel Hempstead Garden Communities – the land released for Growth Area HH01 (Phase 1) to be undertaken 2021 -2038 and the Growth Area HH02 – North Hemel (Phase 2) recorded as being released from Green Belt on adoption of the Plan but safeguarded for 2038 – 2050: this area is designated for around 4,000 homes etc.

We fail to be convinced that Berkhamsted and Tring should be developed to the extent proposed for 2021-2038: the capacity to absorb the growth of over 24% and 50% sustainably is questionable. Appending HH01 and HH02 to the existing urban network is likely to prove to be the more sustainable solution.

**We request the Borough:**

1. Reconsider the allocations [which in any case we dispute as being justified see **Q 7**], and defer the release of BK01 etc. from the 2021 – 2038 plan
2. Re phase the implementation of HH02 to bring forward to 2021 – 2038

This would bring forward some 4,000 homes which will be better located for employment opportunities.

**Sustainability Appraisal**

**Question 6:**

**Do you have any comments on the Sustainability Appraisal that accompanies the Plan?**

**Yes**

**Spatial Strategy and Growth**

**Water availability      Appendix C17**

The comment reflects the concerns residents have about the aquifer and abstraction, set out in stark terms:

**Context:** In 2014/15 the household water use in Dacorum was estimated to be 151.97 litres per head per day which was one of the highest within the County compared to other districts.

Groundwater resources are now at or approaching full utilisation, and many rivers and streams including the Bulbourne, Gade and Ver suffer from unfavourable flow conditions due to climate change causing heavy rainfall and long dry spells which detrimentally impacts upon water quality and creates pressure on underground drainage systems. The Chilterns Chalk Streams are particularly susceptible to over abstraction and urban pollution. The Catchment Abstraction Management Strategy (CAMS) for the Colne catchment (Environment Agency, December 2007) identified that the underlying chalk aquifer is assessed as being 'over-abstracted'.

In relation to water supply, the 'Hertfordshire Water Study 2017'<sup>169</sup> identifies that the availability of water resources in Dacorum is "largely sufficient for 2021 but could require significant improvement by 2051, as with much of the county".

In terms of waste water treatment capacity the Study identified that the main outcomes from the evaluation of need for Dacorum were as follows: "Any development within the Upper Gade catchment by 2031, northwest of Hemel Hempstead, could significantly impact water quality and require sensitive planning; The indicative development areas around Berkhamsted are likely to require strategic intervention from 2031 onwards to accommodate the scale of projected growth within the Berkhamsted STW catchment; The evaluation indicates a large degree of uncertainty in 2051, with the high scenario demonstrating strategic intervention could be required across the district (mainly to improve STW capacity). This scale of intervention could require adaptation of local planning policies and / or construction methods to limit foul flows and promote large-scale water recycling; and Focusing growth proposals on Hemel Hempstead could provide a greater number of unrestricted opportunities, utilising the capacity of the existing system and relieving pressure on Berkhamsted."

|                     |
|---------------------|
| Option E (1,100dpa) |
| x                   |

Providing 1,100 dpa would put additional pressure on water resources when compared to the housing levels proposed under Options A-D. As for those other options, this level of growth could cause issues with potable water supply, with the effect being likely to become even more acute over time as more dwellings are built and the risk of periodic water shortages increases.

**This is a strong indicator about the need to plan for a key infrastructure requirement: the 2031 horizon is barely mid-way through the Draft Plan period. It will not be enough to rely on assumptions that utility providers will deliver under their statutory obligations.**

## Landscape C27

**The SA final paragraph on p27 says:**

Option D requires development of a new settlement in one of two potential locations which would alter the landscape of a part of the borough, in a manner that would be irreversible. The significance of the effects will be dependent on layout and design, including how the settlement is integrated into the existing landscape. Significance will also depend on how the new settlements would affect the setting of the Chilterns AONB.

While the term 'irreversible' is explicitly recognised for this Option [large scale release of Green Belt], this and the adverse impact on AONB is only implied where loss of Green Belt is proposed for other Sites.

## Sustainable Locations C31

**Context:** Hertfordshire's Traffic and Transport Data Report 2018 identifies that traffic within the Borough is forecast to increase by 6% by 2021 from 2017 levels and by 17.4% by 2031.

Mainline rail is a good travel option for Dacorum, with access to four stations: Apsley, Berkhamsted, Hemel Hempstead and Tring. There is also a station in Kings Langley that, although it falls outside of the administrative area of Dacorum, serves existing communities in the area.

There is a good level of bus services in Hemel Hempstead where the network is generally well developed and an adequate level of service in other locations. Markyate is an exception where bus transport is considered unreliable and poorly integrated with other larger local towns in the Borough. A key issue that has been identified is that bus services are not adequately linked between Hemel Hempstead rail station, Maylands and Hemel Hempstead town centre.

A high frequency bus service (No.500) links the settlements of Tring, Berkhamsted, Hemel Hempstead and Kings Langley with other major settlements, including Watford and Aylesbury.

The bus route 500 operates as a commercial service by Arriva at a frequency of 3 buses per hour on Monday-Friday, 2 buses per hour on Saturdays and 1 bus per hour on Sunday shopping hours. There is no evening service or early service on Saturdays. Due to its length, it also suffers from reliability issues. Despite fulfilling the criteria of a "good public transport service" in the Topic papers, there is a paucity of services in other directions from Berkhamsted. We do not agree that a sustainable transport network is in place in Berkhamsted.

### **Appendix E Assessments of Draft Local Plan Proposals and Sites**

The following abstracts from the site assessments show a common theme –

- the distance from the town centre,
- the gradient serving to discourage walking or cycling,
- absence of alternative public transport.

Also their proximity to the A41 - its ambient and peak noise levels may have an adverse effect on Health and Wellbeing to residents unless effective mitigation measures are adopted.

The Attachment with this reply suggests that transport routes should be defined from the outset to encourage residents to use public transport in preference to private vehicles.

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## E.2 Berkhamsted Sites

Site Reference: South of Berkhamsted

Page E38

|    |                       |   |   |
|----|-----------------------|---|---|
| 4  | Climate change        | This site is located reasonably close to the train station, bus stops and town centre though the gradient between the town centre and the site is likely to discourage walking and cycling, which could result in increased car use and growth in the level of greenhouse gas emissions. Whilst the site is situated within 2km of the railway station there remains the likelihood that a proportion will commute to work or make their journey to the station by private car.   | x |
|    |                       | A circular bus route could be provided which could increase use of public transport over private car use, depending on the uptake of this mode. There are also plans for a local centre which could provide the amenities required, thereby reducing the need to travel for some day to day needs. These factors could help reduce the growth in greenhouse gas emissions.<br>The development would be large enough for district heating opportunities to be explored.  | ✓ |
| 5  | Air Quality           | This site is located reasonably close to the train station, bus stops and town centre though the gradient between the town centre and the site is likely to discourage walking and cycling, which could result in increased car use and growth in airborne emissions. However, a circular bus route could be provided, as well as provision of a local centre, both helping to reduce the need to travel. Whilst these factors would help to reduce the growth in airborne emissions, nevertheless the increased traffic resulting from the large number of new dwellings associated with the new development could contribute towards reduced air quality in the town and also exacerbate the air quality issues in Northchurch, where an Air Quality Management Area (AQMA) was designated in 2011 for part of the High Street. | ? |
| 10 | Health and wellbeing  | The site is located reasonably close to the town centre but at a gradient which could discourage walking and cycling. The site is located near the A41 which could result in noise levels that could affect health and wellbeing even with the proposed acoustic bunds in place.  | x |
|    |                       | New open space and recreation facilities provided as part of the development would provide recreational opportunities for new and existing residents of the area.<br>The provision of potential new or enhanced healthcare facilities will help to improve everyone's access to healthcare.   | ✓ |
| 11 | Sustainable locations | There is a local centre planned as part of the development which will meet some day to day needs and help reduce the need to travel. In addition, the development could provide a new bus loop which could be used by new and existing residents and provide opportunities to avoid car use. The development could also improve bus patronage for existing services and support their viability.  | ✓ |

## Site Reference: Land adj. to Blegberry Gardens, Shootersway, Berkhamsted E44

|    |                       |   |   |
|----|-----------------------|---|---|
| 4  | Climate change        | This site is located some distance from the town centre and the gradient between the town centre and the site is likely to discourage walking and cycling, which could result in increased car use and growth in the level of greenhouse gas emissions. The site is not well connected by public transport.   | x |
| 5  | Air Quality           | This site is located a distance from the town centre, which would discourage walking and cycling, so there could be an increased use of the car and growth in the level of airborne emissions. In addition, the gradient between the town centre and the site may make walking and cycling difficult and the site is not well connected by public transport. Additional traffic created by the development could add to existing problems in the AQMA at Northchurch. | x |
| 10 | Health and wellbeing  | The site is located at a distance from the town centre, which could discourage walking and cycling, particularly given the steep gradient. The site is located near the A41 which could result in noise levels that could affect health and wellbeing.  | x |
|    |                       | The development will include new open space for recreation.   | ✓ |
| 11 | Sustainable locations | The site is located at a distance from the town centre and is not well connected by public transport.   | x |

## Site Reference: British Film Institute Archive, Berkhamsted E46

|   |                |  |   |
|---|----------------|--|---|
| 4 | Climate change | This site is located a reasonable distance from the town centre and the gradient between the town centre and the site is likely to discourage walking and cycling, which could result in increased car use and growth in the level of greenhouse gas emissions. The site is not well served by public transport.   | x |
| 5 | Air Quality    | This site is located a reasonable distance from the town centre, which would discourage walking and cycling, so there could be an increased use of the car and growth in the level of airborne emissions. In addition, the gradient between the town centre and the site may make walking and cycling difficult. The site is not well served by public transport. Additional traffic created by the development could add to existing problems in the AQMA at Northchurch. | x |



|    |                       |   |   |
|----|-----------------------|---|---|
| 10 | Health and wellbeing  | This site is close to the A41, which means there would be noise disturbance which could affect the health and well-being of the new residents.                                      | ✘ |
|    |                       | The site is located at a distance from the town centre, which could discourage walking and cycling and the gradient between the town centre and the site may exacerbate this issue. |   |
|    |                       | New open space will be provided as part of the development.   | ✔ |
| 11 | Sustainable locations | The site is located a reasonable distance from the town centre and is not well served by public transport.  | ✘ |

## Evidence Base

### Question 7:

**Do you agree that the Evidence Base that accompanies the Plan is adequate, up- to-date and relevant?**

**No**

### A Housing numbers

We note the discussion provided in Topic Paper ‘Development Strategy November 2020’: this tracks the history, marshals the data and argues that the dwelling numbers for the Reg18 Plan meets the housing needs for the Borough viz 922 [or recently 1023] pa. We dispute this is the correct basis for the Plan – which is based on ‘national requirements’ rather than local needs.

The paper includes a comment:

6.7 The preferred strategy is based on meeting the Borough’s development needs. The Council has concluded that, on balance, this is the most appropriate approach in accordance with national requirements, while recognising that it raises a number of significant challenges for the Borough. Not meeting its housing and other needs could result in:

- the Plan being found unsound and the loss control over unwanted, speculative schemes and its ability to protect areas from development;
- losing opportunities to properly plan for and coordinate essential infrastructure, community facilities, and affordable homes; and
- increasing in-commuting, worsening housing affordability, and economic growth hampered by a shortage of housing.

Below we set out data drawn from reliable sources e.g. ONS and the study commissioned by the Districts' Joint Housing Needs Assessment quoted in the Plan.

The current dwelling numbers established in the Adopted 2013 Core Strategy sets an annual build rate of 430 pa.

- The Data shown in Fig 2 Housing Trajectory 2020 – 2038 [p 38] records anticipated completions across the Borough for 2020/21 as **654** and 21/22 as **1036** . These are well in excess of the Core Strategy and also the numbers projected by ONS.

The numbers set for the Draft Plan have been based on the ONS projections of housing 'need' but manipulated by a formula adopted by MHCLG to determine the 'national requirements' stated in Para 6.7 above.

| <b>Dacorum</b> | <b>ONS projection of Dacorum annual housing growth</b> | <b>After adjustment by MHCLG algorithm</b> | <b>After adjustment by MHCLG algorithm</b> |
|----------------|--|--|--|
| ONS 2014       | 730  | 1023 [new standard applied]                |  |
| ONS 2018       | 355  | 922 [mutant applied]                       | 497 [new standard applied]                 |

As a result, we object to the adoption by the Borough of the Ministry's numbers: a lesser number to meet the assessed local needs must be agreed upon. This must lead to a revision of the site allocations and a new Plan.

We note the data in Table 6 Affordable Housing Need across South West Hertfordshire [page 62] indicates an assessed

need of 611 dwellings pa.

**Affordable Housing Need [per annum]**

|                           | <b>DACORUM</b> |
|---------------------------|----------------|
| Rented affordable housing | 363            |
| Affordable Home Ownership | 248            |
| <b>TOTAL</b>              | <b>611</b>     |

We also note that the Borough assumes a continuing policy of requiring 40% of new dwellings should be allocated as 'affordable' on Growth Areas [viz Green Belt], with 35% in the urban area of Hemel Hempstead and 40% elsewhere [DM 1 para a.]

For an area with acute need for homes at 'social rents' [see Para 14.29 et seq p 62] should the proportion not be increased to 50 or 60%?

This would change the market dynamics and deliver a better share to the community of the uplift to land value following the release of (mainly) Green Belt land and consent to development.

**National Policy and Guidance**

**Question 8:**

**Do you think the Plan is consistent with the National Planning Policy Framework (NPPF) and supporting guidance?**

**NO**

**A** We note the statements in the NPPF Para 11:

**“The presumption in favour of sustainable development.**

*Plans and decisions should apply a presumption in favour of sustainable development.*

*For plan-making this means that:*

*a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

We have previously said we remain unpersuaded on the assumptions made that lead to the number of dwellings proposed to be built over the Plan period. There is an assumption in the Draft Plan that there is demonstrable benefit that outweighs the disbenefits of the proposed release of land from the Green Belt. We dispute that this is the case certainly around Berkhamsted and Northchurch where sub para i and ii should take precedence and be applied.

Comments such as sustaining vibrancy etc are not accompanied by evidence to support the argument.

**B** Maintaining supply and delivery

**Para 73** includes the comment: *Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.*

This invites the question on what is the appropriate number for the local housing need: in this Borough the need is for dwellings at 'affordable cost' or 'social rent'. The footnote 37 [Page 20] states:

*Where local housing need is used as the basis for assessing whether a five-year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.*

This introduces a contradiction and conflates open market housing supply with housing need. This leads to a further increase of dwelling numbers, in excess of what the ONS data is projecting, and locally, to significant demand for Green Belt land release beyond the urban capacity.

The strategic policy adopted in 2013 sets an annual requirement of 430 dpa; the 'local housing need' may be greater than this number, but even so that is larger than the number projected from the 2018 ONS data.

## **C Green Belt – releases**

The Draft Plan sets out to meet the stated number of dwellings as required or calculated by the 'standard method' determined by the Ministry, with a modest buffer. Para 19.6 and 19.7 of the Draft Plan make reference to Para 136 of the NPPF viz:



**19.6** The NPPF states that Green Belt boundaries can only be amended in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 136). There is no definition in the NPPF of what constitutes exceptional circumstances, as this will vary for each locality. In Dacorum, we consider that there is a combination of factors that exist that together constitute the exceptional circumstances that require us to amend the Green Belt boundaries. The Sustainable Development Strategy sets out these challenges and establishes why a planned review of Green Belt Boundaries is justified to meet development needs.

**19.7** We have undertaken a review of the Green Belt and identified those areas on the edge of the main settlements where exceptional circumstances exist to release land for development or where other minor adjustments are necessary. We explore the justification for this in the 'Sustainable Development Strategy' chapter of the Plan. These proposed releases will make a significant contribution to meeting the long term housing and other development needs of the Borough. Green Belt land has been released to enable the delivery of the spatial strategy for Dacorum.

Until the adoption of the Draft Plan, the final sentence should read:

*It is proposed to release Green Belt land to enable the delivery of the spatial strategy for Dacorum.*

**First Dacorum has to 'prove beyond doubt' that "exceptional circumstances" exist to allow the release of Green Belt, which Berkhamsted Citizens remain vehemently opposed to.**

F Para 137 says:

***Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.***

***This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:***

***a) makes as much use as possible of suitable brownfield sites and underutilised land;***

***b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum***

*density standards in town and city centres and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

**We note the 2017 consultation identified Urban Capacity as 10,940 dwellings. We shall leave it to others to determine the technical aspects of a) and b) but we cannot agree that the site locations selected for Berkhamsted [and Northchurch] can be considered as ‘other locations well served by public transport’.**

***We look forward per sub para c) to learning whether discussions with neighbouring authorities prove fruitful.***

**Attachment A ref Question 2 & 3**

## **Public Transport – in General**

### ***What an operator would like, and many passengers.***

A service that goes directly from your origin to destination, with minimum stops, very fast, maximum loading.

The challenge is getting all passengers in one place in the first place. So most public transport ends up with a lot more stops and uneven loads.

Most railways were laid out before the houses, so tend to fit this description. It is not easy to move railways. There is a problem though, when planner and developers build houses a long way from stations which makes the train less attractive. There is still the

stopping pattern problem i.e. too many stops makes the journey slow and unattractive.

Buses have a different problem. When we layout housing estates, we do not think about the bus services. So, they often have to follow the road network, which can make the route structure inefficient. To make a route viable, it must cover many houses, but this often means the route must go “round the houses” a long and winding route, with many stops and lots of detours. The resultant journey is so slow, many people shun the bus and use the car.

So, we need to design new housing estates with a road layout which encourages bus, tram and train use.

When creating new housing, the residents need new services, such as Schools, Health care (doctors and hospitals) and shops, not just transport. There are some key differences though. The other services can be retrofitted to a housing estate. Good public transport must be designed in from the start. For all other services, you need transport to get to them. So, must be designed with transport in mind.

## **New Developments and Transport**

When choosing where to live we have to consider a number of factors, many of them are determined by transport.

- A large proportion of households have two adults working. If they are working, they need to get to work.
- If the house is for a family with children, in most cases they will need to get to school. Often they will be at the same school, but not always.
- The size and cost of house can affect the type of transport needed. Can a house be afforded on 3 times average local wages? Possibly with 2 adults working this could be higher. If they cost more than this, then at least one adult will be traveling a longer distance to a higher paying job. This could

be by train to London or by car somewhere else. If they use the train, they will need to get to the station from their house.

If the house is within a mile of the station on the flat, then walking is easy and can be assumed. If it is further away or up a hill walking will be less attractive. Over a mile or with a steep hill then walking will not be common. Some people will cycle, providing there is secure storage at the station.

There is a challenge with a bus, as you need the bus to connect with the train. Sufficient time must be allowed, to get from one, to the other. Time must be allowed in case one is late. But if it is too long it adds to the overall journey time. This makes public transport less attractive.

When public transport is attractive many people will choose it over the car. But when public transport is too slow, unreliable or undependable people will revert to their cars. In most cases where people have the resources to buy a house, they will also have the choice of using a car. The car will be the default option if the alternatives are not designed to be attractive.

For each household, one adult will create 1 return trip from home to work. For each school visited it could result in 2 return trips a day if in a car.

The question is which mode of transport will be used. This must be planned in when the house is built. Is it practical (safe, secure and easy) for a child to walk or cycle to school? If not then they will normally end up in a car.

Other journeys will also be undertaken by households; however, this paper focuses on the journeys that happen daily and will therefore cause the highest volume of traffic.

Therefore, it should be mandatory for all housing development to have a transport plan to address where the people who live in the houses will; work, go to school etc. Then determine how they will

get there, then how the existing and planned new infrastructure will handle it. If this plan is inadequate the proposal should be rejected. It should also address wider issues such as climate change i.e. the carbon produced by the transport, should be included in the carbon budget for the development as a whole.

### **Wider context**

This paper focuses mainly on the transport need of housing for sale, not rent. However, many of the issues apply to social housing as well as private housing. However, the choices facing people who cannot afford a car, can be different. They are forced to use public transport. But their need for good public transport are often greater.

Everyone's quality of life is determined by the income they can obtain, less the cost of housing and the cost of travel between housing and work.

If you are on a low income, dependent on social housing, but your social housing is too far from your work, you will probably end up on benefits. Or you will spend so much of your time and money travelling to and from work, so as to destroy your quality of life.

### **Berkhamsted**

Berkhamsted is a beautiful town, ideal commuting distance from London. But it has the challenge of its location.

It is set in a relatively steep valley which rises over 60m from the bottom of the valley to the top. The main road up the valley, forms the high street through the town. The Railway station is near the centre of the town. There are not many alternative roads to the high street, to get from one end of the town to the other. There are few radial roads. So for most journeys from the periphery of the town, to any other part of town it is necessary to go through the centre. The result is the main junction in the town is regularly grid locked in rush hour.

The centre of the town was built in the 19<sup>th</sup> century. With narrow streets and no off-street parking. In the 20<sup>th</sup> Century the town continued to expand until the periphery is no longer in walking distance of the centre.

There are no natural routes for new roads to relieve this. The existing roads are not capable of handling the existing traffic.

### **Future development**

There are proposals to build 2,200 new houses on the edge of town. Most of these will be large family houses which will not be affordable on local wages.

No explanation has been provided as to how the town's road and transport system will be able to cope with the resultant journeys that will be generated which will result in a further 13,200 car journeys a day according to 'Trics' (Trip Rate Information Computer System).

**Berkhamsted Citizens Association** is committed to the conservation of the historic built environment of Berkhamsted. This includes Northchurch, its internal green spaces and the retention of the surrounding and integral Green Belt which protects them. Green Belt is the single most important buffer against the coalescence of settlements, the erosion of which will threaten Berkhamsted's distinctive and discrete nature if this Plan is adopted as it stands.



We have been working with the **'ONE VOICE'** ALLIANCE and together we make the following statement ...

### **ONE VOICE ALLIANCE**

*"We the Chiltern Society, Chiltern Countryside Group, Grove Fields Residents Association (GFRA), Berkhamsted Residents Action Group (BRAG), Kings Langley & District Residents Association (KL&DRA), Berkhamsted Citizens and Tring in Transition as the 'One Voice' alliance, oppose the 'Dacorum Local Plan - Emerging Strategy for Growth' because:*

- 1. Whilst the policy on biodiversity is clear, the emerging plan is not explicit enough in terms of how Dacorum Council will work with developers and other stakeholders to mitigate Green Belt loss, increase biodiversity and meet National and Hertfordshire's goals for climate change and carbon reduction*
- 2. The proposed number of houses to be built should be significantly lower than the target to reflect actual demonstrable need for housing and the high proportion of Green Belt and AONB land in Dacorum, with a primary focus on affordable starter homes*
- 3. A higher proportion of the houses should be built on brownfield land, or established through conversions, in the existing urban areas of Hemel Hempstead, Tring, Berkhamsted and Kings Langley, and away from areas located in the Green Belt (which should only be used in exceptional circumstances) and the Chilterns AONB and its setting.*

*While not members of the Alliance, the Chilterns Conservation Board and CPRE Hertfordshire are working closely as advisors to the One Voice alliance."*

*Lindy Foster Weinreb*

*Chairman, Berkhamsted Citizens Association*