

Appendix 6

Question 46 Part 2 of 3

Pages 1697 to 3396



Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the

hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or

business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town

- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents

would walk to and from the town on any pathway provided highly unlikely

- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such



as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
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- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance

- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance

- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment

- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO11443
<b>Full Name</b>	Conian
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing in response to the current consultation to register my views on the proposals.</p> <p>As the Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and to avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response, to add some of my own comments.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development. Very importantly, many of the proposed development sites are in locations which are already identified in the current local plan as being contrary to DBC/national planning policy and antithetical to a number of elements of the Core Strategy. Many have already been rejected by DBC as unsuitable for development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many</p>

of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-SM-Facsimile.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in



the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic character. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41

- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
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- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although

this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading

south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core

Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities
      - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer

months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
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- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely



- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community

- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area

- Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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	<p>over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</p>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO11445
<b>Full Name</b>	Natalie Sawyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I used to live with my parents in Shendish and am now in London. They informed me of the plan to build many houses and a primary school on the land close to them (around the manor house and the barns). I am so upset and wish to express my objections to it although I do understand the need to accommodate more people in the whole of UK as part of the governmental policy.</p> <p>Firstly I am surprised to hear that Shendish is wrongly zoned. It is actually within the parish of Kings Langley and should not be included in the figures related to Hemel Hempstead.</p> <p>The area of Shendish where my parents live is a beautiful area with trees, that were originally planted as part of the Kew arboretum overflow (there is for example a tall eucalyptus tree at the back of my parents garden); there are wild orchids and an amazing range of wildlife which attracts ramblers, dog walkers and local groups.</p> <p>Kings Langley is a village and to build so many properties, offices and school there will put a lot of pressure on the currently stretched out infrastructure. We should look first at sites which are not part of the Green Belt. The proposed plan will put pressure on the trains which are already overcrowded; parking at the train stations has become impossible and as we know there are no suggestions that more trains will be put in service to cope with the increased number of commuters.</p> <p>The traffic in Kings Langley and the London/Hempstead road is a serious concern as it is at gridlock already and not just at peak hours. Of course, if there are more houses, there will be more cars and more pollution which in turn will affect the health of the local community, which in turn will put pressure on the local surgeries and health service. This would definitely not improve the quality of</p>

	<p>life of the inhabitants.</p> <p>With currently such a serious traffic problem, how would the emergency services and ambulances be able to help people if it was made worse?</p> <p>There has been a number of new houses built in the area in the recent years (Apsley Paper Mill, the Nash Mills sites and the Manor Estates) which account to over 2500 houses, I am told. These have definitely contributed to the existing parking and traffic problems, I have noticed every time I visit my parents. If houses were built on the Shendish estate, I can only imagine that the narrow drive and the narrow bridge which are the only access would only worsen the traffic problems. I understand that there are also a number of listed buildings (apart from the manor house) and am surprised that the planning department would allow new houses next to those lovely traditional properties which are under the curtilage of the Shendish manor. I believe that it would also put pressure on the local utilities (broadband is non existent where my parents live, water pressure, sewage systems, electricity, etc ...).</p> <p>I hope wisdom will prevail rather than greed and stupidity in making the final decision.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11462
<b>Full Name</b>	Mr & Mrs J Neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The following comments relate specifically to KL-h1 – Hill Farm, and Dacorum’s Schedule of Site Appraisals (for large greenfield sites) October 2017.</p> <p><u>Technical studies assessment.</u> 9.3 ha with 279 units represents 30/ha and therefore within the definition of medium density. Any significant area devoted to, for example, a small park, allotments, community provision or recreation would be beneficial but would either increase density or require reduced housing units. There is no indication as to the height of buildings; anything over two stories would be out of character.</p> <p><u>Affects key environmental designation?</u> The site is grade 3 agricultural land, generally used for grain, although cattle have been grazed in the past. If, as Transport Secretary Chris Grayling suggested on 15 October 2017, the UK may need to be more self-sufficient it would be foolish to lose existing agricultural land.</p>

Potential new infrastructure provision. The Dacorum Issues & Options Sustainability Appraisal Working Note (October 2017) stated under Climatic Factors that opportunity should be taken to decrease greenhouse gas emissions through reduced reliance on the private car. Site KL-h1 is likely to be very reliant on the private car due to distance from the village, gradient and virtual absence of public transport.

The promoter is suggesting footpath links, off-site road improvements, on and off-site community benefits, social infrastructure contributions and potential small community provision. There is no detail on any of these, no information on the area of land that would be devoted to on-site facilities. A bus loop is listed but there are no details. It is also stated that informal recreation and open space **could be** considered as part of community benefits, such as small park or allotments. Again there is no detail, together with a vague promise.

On and off-site compensatory environmental improvements. There is no indication that there would or could be any off-site compensatory environmental improvements.

Key land use issues raised. Whilst the large loss of Green Belt land is acknowledged, it stated that the site edges are well-defined. If the A41 is the new boundary there is no guarantee that as time goes by the fields between this site and Barnes Lane could be “recommended for further assessment”.

It is said that access could be secured on to Love Lane, but the suitability of this arrangement will need to be confirmed. Wherever access is provided there will be capacity issues. The local roads cannot take further traffic.

Additional housing would further stress local services eg schools, parking, GPs. The Community Centre car park is often full, to the inconvenience of users of the Community Centre, GPs surgery, Library, Bowls Club and local shops. Further growth within the village will aggravate this situation – and no solution has been offered within the plans.

Sustainability. The site is described as having direct and level access to the village centre. The site lies at 135 m, the village centre 80 m. A height difference of 55 metres (180 feet) is not level, indeed Vicarage Lane has a steep hill sign. Any route to the village involves a steep hill which would dissuade most cyclists and walkers for the occasional shopping trip. Local roads are quite narrow and busy, they are not conducive to safe cycling. The nearest bus route 319 via Chipperfield Road and Langley Hill, has two buses a day. The main local open space is the cricket pitch and therefore unavailable on playing days in the season.





the subsequent fifteen years. I therefore have little to add in this regard and I will simply refer you to the report.

The issue of transport, traffic and infrastructure has, however, moved forward significantly, mainly due to the high level of construction in the Apsley area. Access to the Shendish estate is also discussed in the report, increases in general traffic also affected the report's conclusions and I will attempt to summarise my views on these changes and the affects that they have had on the area

In the ensuing fifteen years since this report there have, I believe, been significant changes that raise a number of points of concern –

- Shendish Access
- Roads
  - Local Roads
  - Local Trunk Roads
  - Major Trunk Roads
- Expansion
  - Rail
  - Recent Construction
- Homes
- Commercial
  - Pollution

#### Shendish Access

There are potentially three rail crossing points that could provide access into Shendish, at Featherbed Lane, Shendish Drive and Rucklers Lane - all of these are now traffic bottlenecks

- Featherbed Lane has a new bridge over the railway but no way of improving access onto London Road – the recent changes and additional traffic lights have had a negative effect on traffic flow.

Access roads to the Aspen Park estate (Shearwater Rd and King Edward St) have been designed to cater for the traffic on the estate only and are clearly unsuitable for any significant increase in car journeys.

- Shendish Drive would require widening and even if a new bridge were to be installed there is no space to widen the road between the railway line and London Road – the access to London Road is on a very steep slope and on a sharp bend and this is also surely unsuitable for a massive increase in vehicle traffic.
- The bottom end of Rucklers Lane is very narrow with insufficient parking for the housing density and is already a point of traffic congestion.

#### Local Roads

Between Two Waters and Red Lion Lane there are three canal crossing points - all of which are traffic bottlenecks (Two Waters, Durrants Hill Road and Red Lion Lane).

Between Hemel Hempstead and Kings Langley there are three points of crossing the A41 and the railway – all of these are rural roads and are 'rat runs' contributing to the traffic levels in the area (Featherbed Lane, Rucklers Lane and Barnes Lane).

### Main Trunk Roads

The A41 between Hemel Hempstead and M25 is very busy at the Two Waters junction – roads from Hemel town centre and from Hemel station are always busy and are often stationary – this is exacerbated by the density of industry and supermarket at the Two Waters junction.

During rush hour extremely busy at the junction at the M25.

The A41 seems to be something of an accident blackspot considering the number of road closures, which puts an unacceptable strain on the traffic on London Road.

During the morning commuter period the anticlockwise M25 is stop-start on the Kings Langley junction (J21) all the way to the M4 junction (J12) – there is zero capacity for additional traffic at this time of day

### Road Expansion Capability

- M25 – recently expanded with additional lanes
- A41 – traffic easing at the bottleneck at the M25 roundabout would require major (expensive and lengthy) unbudgeted works
- London Road, Apsley – there is zero expansion capability the road is constrained on both sides
- Canal crossing points – there are no proposals to provide any additional canal crossings
- Railway crossings – an expanded crossing is under construction at Featherbed Lane along with a new road layout and traffic lights where the traffic meets London Road - this has served to simply move the bottleneck to the London Road (and the full extent of the Aspen Park estate traffic is not yet in play)

### Pollution

Taking into consideration the current levels of traffic and traffic congestion pollution levels must surely be a particular issue in the area –

- Density of housing
- Private motor vehicle traffic
- Commercial vehicle traffic
- Frequent main line high speed rail services
- Local rail services
- Aging rail infrastructure and train stock

### Rail Links

Apsley has a mainline commuter station between London Euston and Milton Keynes, the London Midland service at peak times is already overcrowded.

The station has virtually no parking which is always oversubscribed, vehicular access is limited and often blocked by illegally parked cars.

Commuters only seem to walk to the station in fair weather which means the vehicle issues are at their worst in winter months – this also coincides with a reduction in the London Midland service level.

Any expansion of the rail service would simply increase road journeys to and from the station further exacerbating the road overcrowding and subsequent pollution levels

### Construction - Since 2002

There has been extensive building and development in the Aspley area since 2002 – without counting I would estimate that circa 1000 additional homes have been built.

- Aspen Park
- Fourdrinier Way
- Either side of Sealy Way
- Ebbens Road
- On the site of the old Working Men's Club
- To the south of Kents Avenue
- Stationers Place
- Apsley Lock
- Between Belswains Lane/Lower Rd, Red Lion Ln and the Canal

There are proposal, I understand, to build in brown field sites on or adjacent to London Road just to the north side of Two Waters (including an extremely large tower block of flats). This level of construction can have no other effect than a massive increase in traffic and pollution.

Commercial - Since 2002

In addition to housebuilding in Apsley a number of commercial enterprises have been developed, this further adds to congestion in the area, in particular at the junction at Durrants Hill Road and the traffic lights at the entrance to Dunelm.

- Holiday Inn hotel
- Paper Mill public house
- Pharmacy
- New retail units at Storey St and Sealy Way
- New Working Men's Club – since converted to a children's nursery

All the nice stuff....

Just to add my final comments to the Inspectors Report I can only say that for the Green Belt once it's gone it's gone!!!

Wildlife habitats will be destroyed and a valuable local amenity (the golf course) will be lost never to be seen again (it is common knowledge amongst the golfing fraternity that 9 hole golf courses are not desirable or economically viable and are doomed to failure – Boxmoor Golf Club being an obvious example).

The golf course also forms a part of the Shendish Manor 'parkland setting' – the Manor being a conservation area and a site of historic interest.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11467
<b>Full Name</b>	David & Meike Zerny
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Thank you for inviting feedback on the Local Plan.</p> <p>We want to express our concern and alarm that the character of Kings Langley and the surrounding areas will be destroyed by the scale of new housing proposed under some of the options contained in the Plan.</p> <p>This is especially the case if there were development permitted on Green Belt sites such as Wayside Farm, Shendish, Hill Farm and Rectory Farm. All of these are vital to maintaining the essential, rural character of Kings Langley- and stopping Hemel and Watford from becoming a conglomeration.</p> <p>The scale of proposed development is inappropriate for the available space and infrastructure- it would double the size of the village- and no solutions are offered to address the problems of current traffic congestion, let alone the additional impact these housing plans would have on the need for schools, hospital access and emergency services.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11470
<b>Full Name</b>	Mrs Jenny Summerfield
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>GENERAL COMMENT about proposed increase in houses in Bovingdon.</b></p> <p>(NB Previous proposals for further development in Bovingdon raised questions by the Inspector (para 4.27.3) ... <i>“any development would place considerable pressure on local services and exacerbate congestion in the village centre. Bovingdon has reached capacity to cope with the additional development at present. Little scope for primary school to expand, significant traffic and parking congestion in the village centre...”</i></p> <p>Three of the sites put forward for consideration involve just one road - Green Lane - and they (including Duckhall Farm) are listed as greenbelt sites. However, with no notification from the Council these fields have apparently become greenfield sites overnight and therefore become ripe for development!</p>

Green Lane has another 6 new-build houses in the planning application stage (12 cars anticipated), and I suspect many more applications will be made by developers buying up the existing bungalows along the road to create two or more houses on the site. More people, more cars along Green Lane.

The proposed opening of the new Tesco Express (with flats) at the top of the High Street will also add further to the parking problems/congestion, and it will have a detrimental impact on neighbouring shops (in particular the Co-op and the Butchers)

**Bovingdon IS already full, the infrastructure cannot cope and it is fast losing its 'village' feel and identity.**

- 1 There is always traffic congestion in the High Street (at some point along the road and at most times of the day, not just at peak/school times).
- 2 Heavy volumes of traffic come into Bovingdon from Chipperfield Road, Green Lane and Chesham Road/Box Lane.
- 3 The junction of Green Lane and the High Street (at the Monument 'Well') **IS** dangerous for drivers because of the Well in the middle of the road, AND public trying to cross the road
- 4 There is no official car park, the surrounding roads are already full with parked cars, delivery lorries have no dedicated parking spaces and there is very limited parking available elsewhere for shoppers and for the two doctor surgeries and dentist
- 5 The primary school is at capacity
- 6 The doctors surgeries are at capacity
- 7 Public transport: the buses appear to run half empty each day so there is obviously not a great demand
- 8 The school bus (to Kings Langley) is running at half capacity and there is a significant cost for this service
- 9 We have rarely seen any cyclists riding along Chesham Road (Box Lane in particular) – it is far too dangerous apparently
- 0 For every new house/flat built there is one, if not 2-3 cars. A lot of affordable home owners also have cars. (According to the 2011 Herts County Travel survey the average in dacorum borough was 1.04 cars per household,
- 1 Whilst we appreciate that promoting walking/cycling is extremely important, car ownership is going to increase and unless the infrastructure improves significantly and rapidly this is not going to change

Because of the uncertainty for the next 18+ months as to which site may be chosen all the houses directly affected by these proposed sites have already been blighted and it will be difficult, if not impossible, to sell

	at least until the chosen site is finally completed. Until the decision is made it is considered unlikely that houses will achieve the market value currently given by agents.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11471
<b>Full Name</b>	Mrs Jenny Summerfield
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>***** Preferably my answer is NO NEW HOUSES</p> <p><b>1) <u>Bov-h2 Land at Homefield, Green Lane</u></b></p> <p>Development of this site will have a major detrimental affect, both in the short-term and long-term, on the householders living in the houses along two sides of the field because their very small gardens would face directly onto a housing estate (Austins Mead/Yew Tree Drive and the two houses in Homefield at the proposed entrance to the site), and the houses along Green Lane.</p> <p>The field has always been protected as greenbelt land and the residents have enjoyed the benefit of its openness (a pre-requisite for future planning!!) and tranquility – hence buying the properties in the first place. The field is used for horse grazing, pigeon racing (the vendor is involved with this sport and the field is regularly used at weekends in the racing season) and dog walking (with the owners permission). There is a wide variety of wildlife in the field with a resident family of foxes!</p> <p>The developers, Taylor Wimpey, have stated that access to this major site will be via Homefield, a small cul-de-sac of 7 houses leading off Green Lane. Without any consideration to the residents living in Homefield they aim to achieve this by removing the green verges on either side of the road! They have not mentioned that they would also have to fell the mature oak tree at the entrance to the field (a particular feature of the road), and the moving of the telegraph pole which holds the individual BT lines to all the houses.</p> <p><u>Proposed Access:</u> Although a development on this field may meet your requirements to be near to the village amenities so that the new residents can, hopefully, walk/cycle and be healthy, what about the existing</p>

homeowners' health and well-being during the long construction phase of 3-4 years right on our doorstep?

The quality of life for the residents in Homefield, in particular, will deteriorate because of this planned access – continuous construction traffic up & down the road in front of their doors, builders' cars, noise, dust etc etc. It will be impossible to sit in the garden during the construction period.

*Under DCS Policy CS12 it states that developments must avoid visual intrusion... loss of privacy and disturbance of surrounding properties.*

- 1 Access to/from the site from Green Lane into Homefield is not acceptable and it is dangerous (contrary to the report submitted by TW in their Technical Note Access Appraisal (Appendix 2) whereby stating that the site can be accessed safely and efficiently. This could be so – but only at the top of Homefield and entrance to the field)
  
- 1 The visibility when turning out of Homefield into Green Lane is tricky due to the existing high boundary hedges on either side of the road and increasing the width of the road will not improve this. Due to resident's cars parked along Green Lane it is often difficult to get down the road to the High Street without stopping to allow cars to come up Green Lane
- 2 Green Lane is a busy road, not only for drivers going to/from work/shopping/schools but also going to the Football/Tennis Club along the road.
  
- 1 It is also recognised locally that the junction of Green Lane and the Monument (The Well) IS dangerous for both vehicles and pedestrians trying to cross the road. There was a nasty traffic accident recently involving a cyclist.
  
- 1 We also refute their comments on the trip generation with 130+ homes being built in which they say that ... *"Traffic would be spread across a number of routes within Bovington and it is not considered that the scale of traffic would have a significant detrimental impact upon the operation of the local road network..."*

This is incorrect. All vehicles entering and exiting this site would have to use Green Lane as a start point. (To get to Hemel/M1/Station cars turn left from Green Lane into the High Street or to get to Kings Langley/M25/Watford they turn right onto Chipperfield Road). Therefore there will be a huge number of extra cars, delivery vans/construction lorries (during development) entering this one road alone, and it is ridiculous to state that it will not have a detrimental impact on the local roads.

- 1 Homefield has a significant 'slope' which in ice/snow is very hazardous (especially at the

bottom of the road when trying to enter Green Lane). This is not helped when flood water from the field flows down Homefield and freezes.

- 1 Air/diesel pollution levels would seriously increase for the residents of Homefield as the construction vehicles/vans/lorries would have to accelerate past the houses to get up the slope into the field
  
- 1 Members of the public/schoolchildren would have to cross one or two busy roads to get into the village (either via Green Lane or via Yew Tree Drive)
  
- 1 **Length of Construction:** Taylor Wimpey propose building these houses in yearly stages (50:50:50). This is unacceptable. Offering to build in stages is of no benefit to the affected householders and the existing residents of Homefield, in particular, who would have to live with approximately 3+ years of building work and the constant movement of construction vehicles up and down the cul-de-sac in front of their houses, together with the noise and dust pollution. Building a large scale development in stages is purely for the developers' own benefit, as they try and release the first 'installment of houses' to pay for the next batch of building
  
- 1 The developers have not provided for any of the most needed requirements of the village, only promoting 'open space and walkways/cycleways' on this site.
  
- 1 The residents in Austins Mead and Yew Tree Drive will also have their reservations as to the proposals put forward by the developers.

**Suggestion:**

1)Because of the number of existing houses that will be affected by development of this site, it would be sensible to look at other sites where there would be less impact on existing homeowners. Other site promoters offer the same, if not better, amenities for the village as a whole.

- Should this site be chosen by DCC then we feel it is only fair that pressure is put on Taylor Wimpey to complete the site in one go.

**3) TW find an alternative and more appropriate access route**



<b>Number</b>	Question 46
<b>ID</b>	LPIO11472
<b>Full Name</b>	Mrs Jenny Summerfield
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>**** Preferably my answer is NO NEW HOUSES</p> <p><b><u>Bov-h3 Green Lane/Louise Walk</u></b></p> <p>-</p> <p>This proposal is also unacceptable for the size of development proposed and again Green Lane would be used as its access point.</p> <ol style="list-style-type: none"> <li>1 Louise Walk is a narrow cul-de-sac of 3 houses and is not suitable at all for any construction traffic to enter the field(s) in question. The proposal that they could provide improved access to the tennis and football clubs is possibly a 'carrot' to the planners</li> <li>1 The suggestion that they can combine this site with Homefield and therefore vastly increase the number of houses to be built assumes they could use both Homefield and Louise Walk as access roads! All vehicular traffic would still have to use Green Lane and the impact on the local roads would be even worse. The suggestion of possibly implementing traffic flow measures with a "no right turn" stipulation at the exit of Louise Walk into Green Lane is ridiculous. The drivers who have to get to the Chipperfield Road would have to go all the way around Bovingdon via Chesham Road and down the High Street (adding to the existing congestion!)</li> <li>1 They propose a new community hall. There is already a community hall in the village.</li> <li>1 Bovingdon Green is nearby and would provide the open space required.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11473
<b>Full Name</b>	Mrs Jenny Summerfield
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>***** Preferably my answer is NO NEW HOUSES</p> <p><b><u>Bov-h1 Land at Grange Farm, Green Lane</u></b></p> <p><b>We feel that this site is the most appropriate for any development and the developers have seriously considered the Council's brief and offer a lot more for the local community than other sites put forward..</b></p> <ul style="list-style-type: none"> <li>1 This proposed site is located at the quiet top end of Green Lane with access <u>directly off</u> Green Lane itself.</li> <li>1 Unlike other proposed sites, there would be no impact on existing houses with construction traffic entering and exiting the site as the access point will be on the opposite side of the field to the existing residential area, and there are no houses at all along that particular stretch of road where access is planned.</li> <li>1 Traffic can access the site either via Green Lane or Chesham Road, therefore not all of the traffic (during and after construction) will need to use Green Lane.</li> <li>1 Residents will be able to safely walk/cycle to the High Street via the neighbouring residential area (e.g it is a 10 minute walk from the Co-op to the 'back' entrance of the proposed site).</li> <li>1 Bovingdon Green is within easy walking distance from the site. As are the cricket field, tennis courts and football club</li> <li>1 The school bus and regular bus stops are outside the proposed site</li> <li>1 There is an existing children's play area within walking distance in the nearby estate</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11504
<b>Full Name</b>	Mrs G.S Fisher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>There would be an inevitable and visible change to the character of the village if the number of dwellings were to be increased by 25%. A major change such as this would destroy the village ambience and destroy the strong community spirit.</p> <p>Those of us who live in Bovingdon experience daily traffic congestion in the village where there are only a dozen or so off road parking spaces necessitating parking along the upper and lower sections of the High Street where the shortage of parking is exacerbated by the heavy volume of traffic.</p> <p>The B4505 runs from Hemel Hempstead through Bovingdon to Chesham and is the busiest 'B' road in the county. When the market on Bovingdon airfield is open it can take up to an hour to travel from Bovingdon to Hemel Hempstead. Clearly this is a major hazard for emergency vehicles as there is no room to pass the stationary traffic over much of the distance.</p> <p>In Bovingdon there is very little opportunity for employment so every additional dwelling will result in one or two more cars using the B4505 to journey to work. A further community principle is to provide suitable levels of infrastructure to support new developments but there does not appear to be any plan to improve the situation here.</p> <p>As Dacorum has already stated in their environmental assessment the water supply situation for Bovingdon is far from robust and it may well be difficult to find the extra capacity for additional housing.</p> <p>In 2009 the Spatial Strategy for Bovingdon noted that the Village school was full with no room for expansion. Medical services are under pressure. The larger practice in the village also serves Kings Langley so we frequently need to travel to Kings Langley for appointments. As parking in Bovingdon is so difficult, unwell patients have to walk several hundred yards to see a doctor.</p> <p>While Bovingdon has a variety of shops catering for everyday needs the parking situation makes access difficult and this problem will be exacerbated with increased demand.</p> <p>In summary the village is already under stress and it would seem more appropriate and indeed cost effective to concentrate additional housing in areas where the infrastructure is already strong.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO11505
<b>Full Name</b>	Mrs G.S Fisher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The four planned housing developments would use greenbelt land and hence conflict with Dacorum's Core Strategy 'to minimise impact on the Green Belt' and 'safeguard the countryside'. Currently Green Lane is considered a countryside area without street lighting and this would change if further housing areas were to feed on to it.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11506
<b>Full Name</b>	Mrs G.S Fisher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	One of the principles developed from listening to the community is to use 'brownfield sites' so why not Bovingdon airfield? The sites suggested arise purely from land owners seeking to maximise the value of their assets and seems to conflict with the Government's stated intention to protect greenfield areas where possible.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11549
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	HH-h1a and HH-h1b North Hemel Hempstead and HH-h2 North of Gadebridge

	<p>These sites should not be developed as proposed because this would completely engulf the historic settlement of Piccotts End and destroy the character and setting of the Piccotts End Conservation Area. In addition, these sites should not be developed because -</p> <ul style="list-style-type: none"> <li>• loss of 422 hectares + 26.6 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• greenfield development not brownfield</li> <li>• sites are on edge of town, far from the town centre and most services and facilities, so car usage and thus vehicle emissions would increase</li> <li>• development would impact on the Chilterns Area of Outstanding Natural Beauty just to the north, as well as Ancient Woodland, the Chilterns Beechwoods Special Area of Conservation and several Areas of Archaeological Significance.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11550
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h1 Land South of Berkhamsted</b></p> <p>These adjacent sites should not be developed as proposed because this would be a massive over-development of the historic town of Berkhamsted. It would be a major expansion of the town into the Green Belt and would put significant pressure on the already-overloaded infrastructure of the town. In addition, these sites should not be developed because -</p> <ul style="list-style-type: none"> <li>• loss of 43.4 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• greenfield development not brownfield</li> <li>• sites form a very elongated and visually prominent ridge-top location, development of which would forever change the character and setting of Berkhamsted</li> </ul>

	<ul style="list-style-type: none"> <li>• sites are on edge of town, over a mile from the town centre and most services and facilities, there is no public transportation nearby, so car usage and thus vehicle emissions would increase</li> <li>• the extra vehicle traffic would negatively impact on the nearby Northchurch High Street AQMA</li> <li>• sites are at the top of a steep-sided valley, making travel by cycle or on foot difficult</li> <li>• sites were rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11551
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h2 Haslam Fields, Shootersway</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• loss of 3.8 hectares Green Belt land for housing</li> <li>• greenfield development not brownfield</li> <li>• site is on edge of town, over a mile from the town centre and most services and facilities, there is no public transportation nearby, so car usage and thus vehicle emissions would increase</li> <li>• the extra vehicle traffic would negatively impact on the nearby Northchurch High Street AQMA</li> <li>• site is at a visually prominent ridge-top location</li> <li>• site is at the top of a steep-sided valley, making travel by cycle or on foot difficult</li> <li>• site was rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11552
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h3 Land at Ivy House Lane</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• loss of 5.3 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• greenfield development not brownfield</li> <li>• site is at edge of settlement, adjacent to Chilterns AONB and would have direct visual and environmental impact on the AONB</li> <li>• site could only be accessed from Ivy House Lane which is steep and narrow (one car width only) and lacks any verge, pedestrian pavement or footpath making all forms of transport difficult</li> <li>• site is 1.5 miles from the town centre and most services and facilities including public transportation, so car usage and thus vehicle emissions would increase</li> <li>• site is high up the side of a valley, making travel by cycle or on foot difficult even if there were cycleways or pedestrian footpaths which there are not</li> <li>• site is at upper end of broad bowl-shaped valley, from which runoff routinely collects and overflows Ivy House Lane</li> <li>• site was rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11553
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h4 Land between Durrants Lane / Darrs Lane / Bell Lane</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• loss of 21.9 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• greenfield development not brownfield</li> <li>• Dacorum's Green Belt assessment concluded this land should not be further assessed for removal from Green Belt</li> <li>• site is adjacent to Chilterns AONB and would have direct visual and environmental impact on the AONB</li> <li>• site has important archaeology i.e. Grims Ditch</li> </ul>

	<ul style="list-style-type: none"> <li>• site is on edge of town, 2 miles from the town centre and most services and facilities, there is no public transportation nearby, so car usage and thus vehicle emissions would increase</li> <li>• the extra vehicle traffic would negatively impact on the nearby Northchurch High Street AQMA</li> <li>• site is high up the valley side at a visually prominent location</li> <li>• site is at the top of a steep-sided valley, making travel by cycle or on foot difficult</li> <li>• site was rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11554
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h5 Land at Lockfield, New Road, Northchurch</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• loss of 2.4 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• Dacorum's Green Belt assessment concluded this land should not be further assessed for removal from Green Belt</li> <li>• site is at edge of Northchurch settlement, adjacent to Chilterns AONB and impacting on the setting of the AONB and the Grand Union Canal</li> <li>• site is a wildlife haven - I have often seen herons and many other birds there (I am a frequent user of the path that runs along the canal adjacent to the site)</li> <li>• site could only be accessed from New Road which has a narrow, single lane bridge over canal at that point</li> <li>• site is on edge of town, 1.6 miles from the town centre and most services and facilities, so car usage and thus vehicle emissions would increase</li> <li>• the extra vehicle traffic would negatively impact on the nearby Northchurch High Street AQMA</li> <li>• site was rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46



<b>ID</b>	LPIO11555
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h6 Land adjacent to Blegberry Gardens, Shootersway</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• loss of 3.5 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• greenfield development not brownfield</li> <li>• Dacorum's Green Belt assessment concluded this land should be retained as Green Belt</li> <li>• site is in an Area of Archaeological Significance</li> <li>• site is on edge of town, 1.5 miles from the town centre and most services and facilities, there is no public transportation nearby, so car usage and thus vehicle emissions would increase</li> <li>• the extra vehicle traffic would negatively impact on the nearby Northchurch High Street AQMA</li> <li>• site is at a visually prominent ridge-top location</li> <li>• site is at the top of a steep-sided valley, making travel by cycle or on foot difficult</li> <li>• site was rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11556
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h7 Land at Bank Mill Lane</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• loss of 3.9 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• greenfield development not brownfield</li> <li>• site is in Berkhamsted's Conservation area</li> <li>• site is in a flood risk zone, adjacent to the River Bulborne</li> </ul>

	<ul style="list-style-type: none"> <li>• site impacts on the setting of the Chilterns AONB which lies just to the north</li> <li>• site is on edge of town, 1 mile from the town centre and most services and facilities, so car usage and thus vehicle emissions would increase</li> <li>• site was rejected from development consideration in 2006-2031 Core Strategy for all of these reasons, none of which have changed</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11557
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane</b></p> <p>This site should not be developed as proposed because -</p> <ul style="list-style-type: none"> <li>• site is within the Chilterns Area of Outstanding Natural Beauty</li> <li>• loss of 3.8 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• Dacorum's Green Belt assessment concluded this land should be retained as Green Belt</li> <li>• site is beyond the edge of town, 2.3 miles from the town centre and most services and facilities, there is no public transportation nearby, so car usage and thus vehicle emissions would increase</li> <li>• the extra vehicle traffic would negatively impact on the nearby Northchurch High Street AQMA</li> <li>• site has poor road access (a narrow lane)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11558
<b>Full Name</b>	Ms Eliza Hermann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>KL-h3 Land to the East of A41 and Wayside Farm, Watford Road</b></p>

	<p>This site should not be developed as proposed because this would be a major expansion of the village of Kings Langley into the Green Belt, impacting the landscape and views across the valley and along the Gade River and Grand Union canal, impacting a major public right of way (The Hertfordshire Way), and would put significant pressure on the infrastructure of the village. Specifically, this site should not be developed because -</p> <ul style="list-style-type: none"> <li>• loss of 60 hectares Green Belt land</li> <li>• loss of grade 3 agricultural land</li> <li>• elimination of one of Herts' last remaining herds of dairy cattle</li> <li>• Dacorum's Green Belt assessment concluded this land should be retained as Green Belt</li> <li>• greenfield development not brownfield</li> <li>• site is on edge of town, far from the town centre and most services and facilities, so car usage and thus vehicle emissions would increase</li> <li>• site is visually prominent, and development would forever change the character and setting of the village of Kings Langley</li> <li>• site has two Areas of Archaeological Significance and Scheduled Ancient Monuments</li> <li>• site includes the final section of Leg 7 of The Hertfordshire Way long distance footpath with spectacular views across the valley, although no mention is made of this in the Schedule of Site Appraisals, and the National Planning Policy Framework is clear (at paragraph 75) that planning policies should protect and enhance public rights of way. Development of this site would destroy the rural character of this footpath.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11567
<b>Full Name</b>	Ms Anna Barnard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>1 <i>O-h1 Land at Old Kiln Meadow, Water End Road, Potten End</i></p> <p>Potten End is identified as a Small Village in the Green Belt, therefore Policy CS6 of the Adopted Core Strategy applies. There is currently one dwelling on the site and the proposal is for up to 49 dwellings on the site. The site lies adjacent to open land and is effectively the end of village on this side of Water End Road. No studies into the ecology, heritage or potential infrastructure or impact on village facilities have been undertaken. A survey of local housing need has not been undertaken but given the size of the village it is unlikely that there is</p>

	a <u>need</u> for 49 new dwellings. Therefore, the majority of the site is likely to be speculative housing. Whilst a small expansion of the village for local need maybe acceptable there is a vacant, previously development site (Tates Coaches) adjacent to this site which should be developed before any further land is taken out of the Green Belt.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11568
<b>Full Name</b>	Ms Anna Barnard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><i>Be-h3 Land at Ivy House Lane</i></p> <p>This site lies on the edge of Berkhamsted adjacent to the low density development of The Common and the newer Hunters Park. It is at the top of Berkhamsted Hill with the land sloping steeply eastwards. The land to the east lies within the Chilterns AONB and the increased proximity of development to this very attractive area will be severely detrimental to the setting and appearance of the AONB. The proposed development is excessive and would not form a 'soft edge' to the development. The site is some considerable distance from the facilities of Berkhamsted and whilst the promoter suggests the provision of cycle/footpath links, as it is located on the summit of the very steep hill cycling and walking to facilities will be a very arduous affair. There is only a very limited bus service and therefore such development is not considered sustainable. The suggested 'defensible' boundary of Ivy House Lane is some way from this site and therefore even more development in this area would have a devastating effect on this very attractive valley in the AONB.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11569
<b>Full Name</b>	Ms Anna Barnard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Dacorum is sacrificing all the good qualities that exist in the Borough to ever increasing and damaging

	development which cannot be for the benefit of the residents of the Borough for whom they are supposed to safeguard this attractive Borough. It is increasingly being joined to Watford (by the massive development KL-h3 in Kings Langley) and Redbourn and St Albans (by the massive development HH-h1b to the north of Hemel Hempstead.) The important river valley of the Gade will be ruined by development which virtually joins Kings Langley to Hemel Hempstead (KL-h2) and by development on both sides of its northern flow by HH-1a and HH-h2
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11577
<b>Full Name</b>	Elizabeth Harding
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am writing in response to the above. The proposed expansion of homes in Bovingdon is non-sustainable. The traffic through the village is already at breaking point and the high street is often gridlocked. The primary school is at capacity and this has been the case for many years. The doctors and dentists are at capacity and expanding the village housing stock with extra people and cars would have a huge negative impact on the quality of life in the village. If green belt land and farmland around the village is built on, it will be lost forever. Extensive building would also increase the flooding issues that are already experienced in the village. We live in the village to live in the countryside and the village would lose its identity with such a large expansion.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11579
<b>Full Name</b>	Bryan Franklin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>Dacorum Borough Council New Local Plan Notice of Public Consultation –Stage One –Issues and Options</b>

**Comments on and Objections to proposed housing allocation at Site Reference O-h1 Land at Old Kiln Meadow , Water End Road, Potten End, Herts. December 8th 2017**

1 Adopted core strategy and local policy – Distribution of Development and Settlement Hierarchy

The adopted core strategy 2013, sets out the settlement hierarchy for the Borough. Potten End is noted as being a small village within the green belt and as such is one of the least sustainable areas of the Borough for development, where significant environmental constraints apply.

Policy CS1 states that the countryside between settlements needs to be protected to ensure its rural character is retained and settlements retain their individual identities.

Policy CS6 states that “Limited infilling” with affordable housing for local people will be permitted in selected small villages. Policy CS20 encourages “small –scale” schemes on rural sites for local affordable homes.

The proposed site is 3.2 ha in area and the development of between 45 and 49 new dwellings represents a sizeable eastern extension to Potten End and is well outside the definition of “limited infilling” and/or “small scale”. The Council’s schedule of site appraisals refers to the proposal; as “medium” scale on the edge of the settlement and is contrary to policies CS1, CS6 and CS20.

2 Sustainability Issues.

The village has very limited facilities and therefore any significant increases in housing numbers will require a large increase in journeys to other large centres contributing to the current congestion in the village during school times and when local facilities are being used for people visiting the village.

Technical Studies Assessments:

-

3 Green Belt Review.

The proposed allocation has not been included in any previous Green Belt Reviews including the Stage 2 Green Belt Review and landscape appraisal which would need to be fully scrutinised using this process in order to be fully and properly assessed.

-

4 SHLAA

The proposed allocation has not been assessed in the SHLAA and would need to be fully scrutinised using this process to be properly and fully assessed.

#### 5 Archaeological Issues.

It is understood that a roman road is located along the perimeter of the site together with historic brickworks also on the site. Any development of the site would cause serious harm to the heritage assets that should be protected and preserved.

-

#### 6 Ecological Issues.

The site contains mature woodlands both within and along the edges of the site boundary as well as a pond. Any housing development is highly likely to adversely impact on the local ecology.

#### 7 Infrastructure Issues.

Serious consideration will be necessary of potential capital costs and disruption which will be attracted by the proposed development thereby further affecting the quality and availability of statutory services for the site together with information technology and communication systems. The village suffers from inadequate services to many parts and the new proposal would require a full evaluation of not only the proposed development but also the impact on the existing local residents' facilities.

The school and nursery already have been extended to maximum size and continue to attract pupils from surrounding areas with consequential adverse impact on the village life.

#### 8 Parish Council and Affordable Housing.

Any development in Potten End will need to be of limited infilling and/or small scale with the support of the Parish Council.

To date the Parish Council has not consulted residents on the need or otherwise for affordable housing in the village, nor has it made any assessments of the most sustainable location for affordable housing. That will need to be addressed.

#### 9 Conclusion and Summary.

The proposed site does not comply with the adopted core strategy and is in conflict with policies CS1, CS6 and CS20.

The site is not in a sustainable location.

The site has not been properly assessed as part of the Green Belt Review or the SHLAA.

	<p>The development will cause harm to the heritage assets and local ecology.</p> <p>The Parish Council has not consulted with local residents and has not identified a local need for affordable housing.</p> <p>For these reasons a proposed site should be rejected.</p> <p>Ref BF 16</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11580
<b>Full Name</b>	Marianne Cotterill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have been living in Berkhamsted since December 2002. I bought xxxxx and love living in this lovely town. However, since I moved here I have noticed how the town is constantly changing and not for the better. Many beauty spots have been destroyed with building work, popular shops and businesses have closed due to building of housing including flats and 600 more houses are planned to be built. They have already recently built 628 houses which means a greater struggle for parking places, traffic congestion, greater difficulty getting GP appointments or places at our local schools. We cannot now have another 1,600 houses built here. It will destroy our beautiful town and greatly participate in making living here more and more unsustainable!! Is this really what Dacorum wants??</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11582
<b>Full Name</b>	Sharon Stone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object to the strategic plan for additional housing that is being consulted on.</p> <p>Whilst I do not object to Dacorum addressing the need for additional housing in the area or indeed of the careful or well thought out planning for new housing in the area</p>



	<p>I feel that certain aspects of any plan should take into the account the following ....</p> <p>The infrastructure of the village would not support so many extra families. Doctor's, dentists already difficult to get appointments. The school is full and no room for expansion.</p> <p>The village is becoming overcrowded with landowners selling land and developers trying to cram in as many houses as possible.</p> <p>The main road into the village Box Lane is already the busiest B road in Hertfordshire and this coupled with more traffic will see even more delays than currently.</p> <p>The village is prone to flooding too and this would need to be looked at.</p> <p>The high street is already congested and parking a problem.</p> <p>It would change what is a village into a town and there are already enough infrastructure challenges before adding to the problems.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11583
<b>Full Name</b>	Janet and James Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p>

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-SMVA-compl.pdf>

for a full analysis of stage 1). In short, both of the DBC commissioned papers provide textbook examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with

developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built

and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly

Swing Gate Lane and any potential to upgrade

- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.

- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of ‘bus loop’ not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet

requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more



- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway

station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane

- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the

services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB
    - Suggestion of potential new primary school – not part of Berkhamsted education policy
    - Lack of secondary school capacity – Ashlyns School
    - Same arguments on accessible housing – distance from facilities and services

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town

	<ul style="list-style-type: none"> <li>Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> <p>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low</p>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO11637
<b>Full Name</b>	LUCY BANCROFT
<b>Company / Organisation</b>	Aldbury Parish Council
<b>Position</b>	Parish Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>Proposed Change of site Tr-h1 (Land to the north of Station Road) from Green Belt to Residential</u></b></p> <p>The site comprises 52 hectares of agricultural land with the proposed use primarily for residential development but could also include recreational and community facilities. The landowner (Harrow Estates plc) and agent (Turley) propose a potential housing capacity of up to 1,000 dwellings but it should be appreciated that the site could contain up to 1,820 dwellings if the site is given over wholly to housing. The site does not lie within the Chilterns Area of Outstanding Natural Beauty (AONB) but is in the Green Belt. The principles of the Green Belt are set out in the National Planning Policy Framework (NPPF) (Section 9 – paras 79-92). Green Belt exists to provide open space and to prevent urban sprawl. NPPF para 79 states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence”. It is there neither to protect nor to enhance the landscape, although it may do that incidentally. The effect of building housing along Station road on this site will be to extend Tring</p>



Town geographically so that it absorbs the hamlet of Tring Station, the West Ward of Aldbury Parish. This will permanently remove the buffer zone between Tring Town and the Chilterns AONB. It will also impact adversely on visual aspects of the Chilterns AONB which covers part of the south side of Station Road opposite the site Tr-h1. The site will also adjoin the Chilterns AONB to the east if the site is developed as far as the Grand Union Canal.

Aldbury Parish Council is against the development of the site Tr-h1. It has insufficient knowledge of the Borough as a whole to be able to suggest alternative sites that should be developed instead of Tr-h1. It does in any case, as stated above, recommend Growth Option 2B with its greater focus on Hemel Hempstead. It does moreover believe that the site should be very low in the priority of sites to be considered for development in view of the loss of the buffer zone between Tring Town and the Parish and the permanent damage that would be inflicted on the neighbouring Chilterns AONB. The Parish Council does of course recognise that most of the site Tr-h1 is in Tring Town and that Tring Town Council will have its own views on priorities that it will wish to contribute. However the Parish Council does not believe that it is in the interests of the Borough or the local environment for this site to be developed. The site provides a green space that adds visual attraction to the journey between Tring Town and Tring Station and provides a much needed buffer between Tring Town and the Chilterns AONB. This after all was the whole point of this land being designated as Green Belt.

**Potential Infrastructural Requirements if site Tr-h1 is removed from the Green Belt**

If site Tr-h1, is to be removed from the Green Belt, Aldbury Parish Council agrees in principle with the provision of a primary school, a community hall, multiple use games area (MUGA) and health centre. Shopping facilities would also be worth considering. It would be sensible for facilities to be located in the sector closest to Tring Station as the hamlet is poorly served for facilities, apart from the obvious major facility, the railway station. The existing community hall, "the Iron Room", has limited facilities, has no dedicated off street parking and there is very limited on street parking available. The green space to the rear of the Iron Room serves as the children's play area but is just a green space. It has to be assumed that no further car parking spaces will become available at the railway station due to Green Belt/AONB constraints. The emphasis will have to be on sustainable access, e.g. cycle/footpath links, commercial bus links and community bus links from surrounding areas. There may at some stage need to be consideration of a Park & Ride scheme depending on the scale of development approved. There would also need to be consideration given to traffic calming in the hamlet of Tring Station to take account of increased traffic volumes. There are already particular difficulties and safety concerns with access from Northfield Road & Clarkes Spring onto Station Road due to the volume of existing traffic during peak times.

	Careful and detailed consideration will need to be given to the potential infrastructure requirements if all or part of site Tr-h1 is removed from the Green Belt.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11638
<b>Full Name</b>	LUCY BANCROFT
<b>Company / Organisation</b>	Aldbury Parish Council
<b>Position</b>	Parish Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>Proposed Change of sites Tr-h2 (Land west of Marshcroft Lane) and Tr-h3 (Land at Icknield Way/Grove Road (New Mill)) from Green Belt to Residential</u></b></p> <p>The site Tr-h2 comprises 4.68 hectares of agricultural land with the proposed use being for residential development. The landowner (Simon Westrope) and agent (Bidwells) propose a potential housing capacity of up to 77 dwellings but it should be appreciated that the site could contain up to 163 dwellings if the site is given over wholly to housing. It is of course for Tring Town Council to make detailed comments on the possible development as it sees fit.</p> <p>The site Tr-h3 comprises 14.66 hectares of agricultural land with the proposed use being for residential development. The landowner (RELX) and agents/developers (Gallagher Estates and Pegasus Group) propose a potential housing capacity of up to 400 dwellings but it should be appreciated that the site could contain up to 513 dwellings if the site is given over wholly to housing. It is of course for Tring Town Council to make detailed comments on the possible development as it sees fit.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11639
<b>Full Name</b>	LUCY BANCROFT
<b>Company / Organisation</b>	Aldbury Parish Council
<b>Position</b>	Parish Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Aldbury Parish Council would be against the linking of sites Tr-h1, Tr-h2 and Tr-h3 to form a neighbourhood

	stretching from Station Road to Bulbourne Road B488. This would give a housing capacity of between 1,477 houses to 2,496 houses which would constitute gross over development. By itself the creation of a new Tring north east distributor road (connecting Station Road/Marshcroft Lane/Bulbourne Road) would not seem to provide any benefit as it will merely move traffic from one congested road to another congested road in both directions. No one will be getting anywhere any more quickly.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11659
<b>Full Name</b>	john and barbara neale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The following comments relate specifically to KL-h1 – Hill Farm, and Dacorum’s Schedule of Site Appraisals (for large greenfield sites) October 2017.</p> <p><u>Technical studies assessment.</u> 9.3 ha with 279 units represents 30/ha and therefore within the definition of medium density. Any significant area devoted to, for example, a small park, allotments, community provision or recreation would be beneficial but would either increase density or require reduced housing units. There is no indication as to the height of buildings; anything over two stories would be out of character.</p> <p><u>Affects key environmental designation?</u> The site is grade 3 agricultural land, generally used for grain, although cattle have been grazed in the past. If, as Transport Secretary Chris Grayling suggested on 15 October 2017, the UK may need to be more self-sufficient it would be foolish to lose existing agricultural land.</p> <p><u>Potential new infrastructure provision.</u> The Dacorum Issues &amp; Options Sustainability Appraisal Working Note (October 2017) stated under Climatic Factors that opportunity should be taken to decrease greenhouse gas emissions through reduced reliance on the private car. Site KL-h1 is likely to be very reliant on the private car due to distance from the village, gradient and virtual absence of public transport.</p> <p>The promoter is suggesting footpath links, off-site road improvements, on and off-site community benefits, social infrastructure contributions and potential small community provision. There is no detail on any of these, no information on the area of land that would be devoted to on-site facilities. A bus loop is listed but there are no details. It is also stated that informal recreation and open space <b>could be</b> considered as part of community</p>

benefits, such as small park or allotments. Again there is no detail, together with a vague promise.

On and off-site compensatory environmental improvements. There is no indication that there would or could be any off-site compensatory environmental improvements.

Key land use issues raised. Whilst the large loss of Green Belt land is acknowledged, it stated that the site edges are well-defined. If the A41 is the new boundary there is no guarantee that as time goes by the fields between this site and Barnes Lane could be “recommended for further assessment”.

It is said that access could be secured on to Love Lane, but the suitability of this arrangement will need to be confirmed. Wherever access is provided there will be capacity issues. The local roads cannot take further traffic.

Additional housing would further stress local services eg schools, parking, GPs. The Community Centre car park is often full, to the inconvenience of users of the Community Centre, GPs surgery, Library, Bowls Club and local shops. Further growth within the village will aggravate this situation – and no solution has been offered within the plans.

Sustainability. The site is described as having direct and level access to the village centre. The site lies at 135 m, the village centre 80 m. A height difference of 55 metres (180 feet) is not level, indeed Vicarage Lane has a steep hill sign. Any route to the village involves a steep hill which would dissuade most cyclists and walkers for the occasional shopping trip. Local roads are quite narrow and busy, they are not conducive to safe cycling. The nearest bus route 319 via Chipperfield Road and Langley Hill, has two buses a day. The main local open space is the cricket pitch and therefore unavailable on playing days in the season.

The site is described as relatively accessible. With access via Love Lane the site would add to the considerable congestion that occurs at school opening and closing times. At present there is parking through the day as well as at the beginning and end of the school day in Love Lane. This parking could overflow to roads on the new site.

The site is described as having potential to deliver a variety of on-site play space, open spaces and footpath links. There is no clarity in this section on how footpath links would be achieved.

There is reference to close proximity to a local sports facility – is this the Cricket Club? The term sports facility gives the impression of a building with swimming pool, badminton courts etc. Kings Langley School lost its swimming pool at the recent extension.

If roe deer are seen as part of the local ecology then they would be affected by any development. A family group of five has been seen in the fields.

The site is frequently overflown by light aircraft and helicopters on east-west routes, the environmental and safety aspects of this have not been considered.

	Properties adjacent to the A41 will be subject to considerable road noise.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11693
<b>Full Name</b>	VIVIENNE ADAMS
<b>Company / Organisation</b>	Flaunden Parish Council
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Summary</b></p> <p>Flaunden Parish Council is particularly concerned that development in the Bovingdon and Kings Langley areas would be detrimental to the ability of our residents to retain their current levels of access to the surrounding towns of Hemel Hempstead and Chesham There would be a risk that Flaunden could become 'cut-off' due to the resultant congestion on what are narrow and already very congested roads, particularly in the Green Lane /Shantock Hall Lane area of Bovingdon.</p> <p>This becomes even more pertinent when considering the current issues residents are facing with respect to access to transport for employment, exacerbated further by the oversubscription of schools that require parents to drive many miles to access education for their children.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11695
<b>Full Name</b>	LUCY BANCROFT
<b>Company / Organisation</b>	Tring Rural Parish Council
<b>Position</b>	clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We, as the Tring Rural Parish Council, are not opposed to the new development outlined for Grange Road ,Wilstone However we would like to be involved at the planning stage to help understand the needs of the local community This would probably result in looking to develop the site for units/houses/flats which are aimed at either the first time buyer or elderly persons namely affordable in price and compact in layout</p> <p>We would like to be allowed to influence the design so that it is in keeping with the local architecture especially</p>

	<p>as the development will be seen from the road and is on one of the approaches to the Village</p> <p>We would need to have the Local Authority and Developer undertake the necessary surveys to establish the need to invest in expanding the current infrastructure</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11699
<b>Full Name</b>	Mrs Lydia Berman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have submitted my responses online, but there was nowhere to make clear that Shendish has been wrongly included in the Hemel area. Shendish is very much part of Kings Langley. This has a massive impact on our choice of Option and caused confusion as to which is the clearest option to not include our Green Belt. I would like my stated preference to be Option 1A, BUT Shendish needs to be correctly included in the Kings Langley area - which it is!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11702
<b>Full Name</b>	Susanne Rees
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have been flabbergasted by the options set out in the Dacorum Council's document Local Plan - Issues and Options, as the options actually countenance building on green belt land around an historic village.</p> <p>Kings Langley is an historic place, as it was the capital of England during the Great Plague.</p> <p>The historic nature of the village needs to be nursed for the benefit of current and future generations.</p> <p>In what would be an act of historical vandalism one of the proposals suggests building on the site of the palace - from where the country was governed - and on the grounds of the palace.</p>

	Not only that, but Kings Langley quite palpably does not have the infrastructure to cope with hundreds of new homes, crammed in on the green belt.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11710
<b>Full Name</b>	Susanne Rees
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Kings Langley neither has the roads, nor the schools, nor the GP practices to cope with an explosion of housing.</p> <p>Any development on the scale envisaged would hugely exacerbate parking problems in Kings Langley, and increase traffic movements in and around the village.</p> <p>The proposals would double the size of Kings Langley and it would clearly have to lose its status as a village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11713
<b>Full Name</b>	Susanne Rees
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The protection afforded to Kings Langley, under such an approach, should of course encompass Shendish - which is part of the parish of Kings Langley and is an integral part of our historic village that so desperately needs to be protected.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11733
<b>Full Name</b>	Mr Wayne Hill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write to object against the proposals put forward for the 4 sites in Kings Langley, specifically</p> <p><b>KL-h1 - Land at Hill Farn, Love Lane</b>  <b>KL-h2 - Land at Rectory Farm, Hempstead Road</b>  <b>KL-h3 - Land to the east of A41 and Wayside Farm, Watford Road</b></p> <p>My concerns for these proposals is the lack of thought given to the infrastructure of our village. This would massively impact the traffic and congestion through our streets which are busy already. It would also impact the ethos for the village we know and love. We also want to protect the green belt, once this is built on, it opens more pathways to further development across the country and we will lose the wildlife and nature, causing further harm to the environment.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11734
<b>Full Name</b>	Steven Bowen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are writing to respond to aspects of the consultation regarding the new Dacorum local plan as they impact Bovingdon.</p> <p>The background to our comments is:</p> <p>While we understand the need for new housing in Dacorum in the period up to 2036 we have specific concerns regarding the expansion of housing around Bovingdon. In particular we are very aware that, as set out in the assessment of the options, that the village centre already suffers from congestion and the nature of the streetscape is such that it is difficult to see how these problems can be easily resolved - in fact the upcoming addition of a retail unit close to the junction of the High St &amp; Chesham Rd, will materially increase congestion at this local pinch point. We are of the opinion that the material addition of new houses in the village would only exacerbate the current problems. We note that none of the proposed sites (BOV-h1 to BOV-h4) have made any proposals to mitigate the village centre problems, despite them adding new vehicular traffic. In this context we note that the location of the village, and the limited public transport available, mean that travel by car is by far and away the most common method of travel by local residents.</p>



	In addition, we have real concerns about how the schooling infrastructure in the village would cope with the addition of a material number of new families. We would be particularly concerned if the solution to this growth would be the loss of more public open green space in the village centre. We also note that one of the periods when traffic congestion in the village is at its worst is when the primary school starts and finishes. Adding more houses will only make this congestion worse.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11738
<b>Full Name</b>	Steven Bowen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>If Dacorum was able to identify appropriate traffic and schooling infrastructure mitigation measures that did not result in the loss of further local green space then our preference among the four sites proposed is clearly for site BOV-h1. The reasons for this preference are</p> <ul style="list-style-type: none"> <li>• this is the only site that realistically provides defendable new green belt boundaries. While the assessment argues that the other options have “generally well defined site edges” we cannot agree with this assessment. All of the other three sites would abut directly or indirectly onto other green belt land and fields ...and we see a real risk that use of these sites would start a bleed of the village out into green belt land that in the case of BOV-h2 and BOV-h3 would not hit a natural boundary until Flaunden Lane is reached. In the case of site BOV-h4, the use of this site would potentially open up land behind the houses on Chesham Road for eventual development. We note that the current Core Strategy has as one of its aims to “minimise impact on the green belt” and “safeguard the countryside”. We would see the development of all three of these sites (BOV-h2-BOVh4) would be very contrary to these aims.</li> <li>• As a local resident who was previously a traffic and highways engineer, I fail to see how any proposal that has access onto Green Lane at the village centre end could be anything but detrimental to local traffic flow and safety. This section of Green Lane has, for much of its length, parking all along one side, making the useable carriageway only one lane. This makes this section of the lane as unsuitable for extra traffic. By contrast, site BOV-h1, would have access onto a much more open section of Green lane and would provide almost direct access out onto Chesham</li> </ul>

	<p>Road, without traffic having to go through the village.</p> <p>Our final point is a reiteration of our main concerns - put simply, none of the proposed sites offers anything that will mitigate the current traffic congestion issues in the village and there are no proposals as to how the current capacity issues at the local primary school will be resolved. In the absence of this we fail to see how extra housing can be provided in the village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11739
<b>Full Name</b>	Steven Bowen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We appreciate that Dacorum can only consider proposals brought forward by land owners for consideration ... however, we struggle to see why the use of the current airfield site, which is in all practical senses brownfield land, would not be the preferred option for extra housing in the village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11785
<b>Full Name</b>	Edmund Hobley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</b></p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed</p>

are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**Brag Response to question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/07/BRAG-Analysis-of-the-Green-Belt-Review-of-the-DBC-SMVA-2015.pdf>

for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the

Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built

and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly

Swing Gate Lane and any potential to upgrade

- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.

- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of ‘bus loop’ not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet



requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway

station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane

- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the

services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station
  
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other land
- Some distance from the town centre
- Next to the Chilterns AONB
- Site is too small to offer scope for additional town-wide leisure space
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
- Visually prominent site
- Proximity to railway line
- Impact on setting of the canal

- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41 bypass
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car

use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Encroachment of the urban area along the valley bottom and into adjoining open countryside
  - Distance from the town centre services and facilities, employment land and station.
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable



	<p>- too far for residents to walk to and from the town</p> <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO11791
<b>Full Name</b>	Mr Michael Demidecki
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>Landscape and Biodiversity</u></b></p> <p>The hedges alongside Marshcroft Lane are old and of importance in their own right for their trees and shrubs, and for the wildlife they support. The following woody plants are to be found there: sycamore, elm, elder, blackthorn, field maple, ash, hazel, Norway maple, rose, holly, hawthorn, cherry plum, plum, spindle and dogwood (15 species in all). A count of woody plants along one 30 metre stretch alone has revealed six woody plants species, making the hedge according to Hooper's hedgerow hypothesis some 600 years old.</p> <p>Many bird species make use of these hedges.</p>

On 16.04.2017 the dawn chorus of birds to be heard along Marshcroft Lane (south west of the canal) was as follows:

5.05am Canada geese

5.07am pheasant

5.09am wood pigeon

5.05am skylark

5.16am robin

5.165am blackcap

5.18am tawny owl

5.19am blackbird

5.20am mistle thrush

5.25am wren

5.30am blackcap

5.33am great tit

5.35am chiff chaff

5.38am coal tit

5.42am magpie

5.43am house sparrow,

5.44asm collared dove

On 11.05.2017 , at a time when cow parsley was in flower, making both sides of Marshcroft Lane particularly attractive, there were in the evening

4 blackcaps singing,

2 wrens singing,

3 chaffinches singing,

1 chiff chaff singing,

2 robins singing,

1 song thrush singing, and

3 blackbirds singing and to seen.

On 07.12.2017 a walk down Marshcroft Lane (north eastwards as far as the canal) revealed the following birds making use of the hedges: goldfinches, chaffinches, green finch, fieldfare, redwings, wren, starling, robin, blackbird, great spotted woodpecker, great tit, blue tit, and a thrush.

Building on both sides of Marshcroft Lane will have severe consequences for this special environment, and may as mentioned adversely impact the Chiltern Beechwoods Special Area of Conservation.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11792
<b>Full Name</b>	Mr Michael Demidecki
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>Historic environment</u></b></p> <p>It is noted that a small area of Archaeological Significance lies within the western part of site Tr-h1. This is said to comprise “an enclosure of probable Iron Age or Roman date that has been identified from cropmarks visible on aerial photographs” (page 72 of Dacorum’s Schedule of Site Appraisals (for Large Greenfield Sites) October 2017). I would like to see an investigation of this important Archaeological area before further consideration is given to development of this site.</p> <p>For all the above reasons I oppose the current proposals for sites Tr-h1, Tr-h2 and Tr-h3.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11796
<b>Full Name</b>	Rodney O'Callaghan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>4, Affordability,</b></p> <p>The cost of housing in Dacorum is high (as defined by multiples of average salary) and there is a need for affordable housing . However your representative at the consultation indicated that the definition of “affordable” is where a</p> <p>developer will offer a 10% discount given that most of the property in TR-H1 is very convient to the station many of the properties will be similar to other properties on this road which are £1000000 to £1500000 even a 10% discount</p> <p>will not make them affordable.</p> <p>In addition I gather that developers can “pay” the council to avoid this requirement.</p> <p>It seems probable that most of the population increase will come from London Commuters rather than Dacorum residents .</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11799
<b>Full Name</b>	Rodney O'Callaghan
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>6 Planning Criteria ,</b></p> <p>Your representative stated that the basis for plans were those areas where landowners has indicated a desire to develop rather than areas identified by the council .</p> <p>If this correct the council has abdicated it's responsibilities for planning to the developers.On this basis there is no reason to expect that the current plan will be the end of proposed development .</p> <p>Speculators are already buying up farmland . (given that the TR-H1 site alone represents a potential profit of £247500000 since sale in 2014) this os not surprising..</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11802
<b>Full Name</b>	John Thomson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Secondly, you have wrongly included site HH-h3 Shendish under Hemel Hempstead, whereas it is totally in the parish of Kings Langley and is a part thereof. I understand that KL Parish Council and KL residents are responding on the basis that Shendish is a KL site.</p> <p>I now list my many objections to your removing Shendish (HH-h3) from the Green Belt and to the housing site allocation proposed. There are very many constraints:-</p> <ol style="list-style-type: none"> <li>1. Shendish contains history and heritage (see Alan Penwarden's booklet dated 2006 from the Kings Langley Local History &amp; Museum Society), and the Vision statement says "the wider historic environment is valued and protected". The site justifies preservation as is.</li> <li>2. The Planning Inspector has previously and resoundingly pronounced Shendish as inappropriate for development for many reasons (see his report of 2002 re the then local plan) when Shendish Manor Hotel under previous ownership proposed it. Although 15 years ago, the constraints and problems then identified have manifested and increased.</li> <li>3. Development of Shendish will greatly affect the massive population/residents of Hemel Hempstead living opposite on the northern slopes of the Gade Valley who will incur an adverse visual impact (already suffered via the Manor Estate development). Photos (albeit not the</li> </ol>

best) taken from the northern Gade Valley slopes are attached as evidence.

4. Even the Green Belt Review and Landscape Appraisal (Stage 2, Jan 2016 - less than two years ago) comes to the same conclusion, but I question its judgement of recommending further consideration of the release of a small slice of land at the foot of Shendish abutting the railway, because it will still result in an adverse visual impact and suffer from the other site constraints

5. The site ownership is understated/incorrect - parts (which I understand are not offered for development) are not in the ownership of those disclosed in the proposals

6. As well as history going back before the 1300's the site contains listed buildings, a locally registered park and garden, and area of archaeological interest, which should not be encroached upon by new housing. I also understand that trees were planted many years ago as an overspill arboretum from Kew Gardens which adds to Shendish being a place of environmental importance.

7. Access (to/from the A4251 and to/from Rucklers Lane) is a major constraint that will be difficult to improve having regard to the height of the railway alongside the A4251, the narrowness of Rucklers Lane, the Red Lion/railway bridge junction restriction on traffic flow, and the general congestion along the A4251 following the increased housing and business development along it in recent years. The current narrow bridge access for the site at the A4251 is totally inadequate for a neighbourhood housing development

8. The area should not be forced to cope with another 900 dwellings, the resulting traffic, demand on services, and pollution, following the 2,500 plus dwellings that I understand have been built nearby in recent years. The area has in my judgement become saturated and, in view of the local population growth, Shendish should remain as a pleasant visual impact and a recreational and leisure facility within easy reach. It is the last such open and green site left locally - 18 hole golf course, public footpaths, rambling, walking and wildlife

9. Housing development at Shendish would coalesce with Rucklers Lane and join Hemel Hempstead and Apsley with the wider Kings Langley. I believe such coalescence is against policy. Green Belt retention would also compensate for the development of the adjacent Manor Estate

10. Dacorum has recently granted Shendish Manor Hotel planning permission for a new extension, leisure centre, etc, inter alia having regard to its parkland setting and historic garden - it now seems inappropriate to surround it with housing. Indeed, reports were submitted to Dacorum Planners during planning consideration which referred to Natural England designated ancient woodland, and a moderate soluble rock hazard rating re a contamination report

11. It seems illogical to provide additional substantial housing in south Hemel Hempstead when the major employment source is north Hemel Hempstead (e.g., Maylands and Green Lane (St Albans)). Even the adjacent Apsley station has limited destination and frequency (unless wishing to travel to London at great cost and in congested conditions)

	12. In summary, I do not consider on behalf of the borough that Shendish is a sustainable housing development option, having regard to its constraints, the traffic congestion, its location, the nearby existing and planned (eg., the Beacon project) developments, and the need to create a balance between housing and preserved greenery. Its Green Belt status should be preserved.
Include files	<a href="#">Mr John Thomson - IMG_20171122_130122.jpg</a> <a href="#">Mr John Thomson - IMG_20171122_123749.jpg</a>
Number	Question 46
ID	LPIO11833
Full Name	peter faulkner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>1 <b>Site Appraisals.</b> These are discredited by completely false statements such as:-</p> <p>Hill Farm: "There is direct and level access to the village centre for walking and cycling". The clue is in the name!! Hill Farm is remote from and has a steep descent to the village centre.</p> <p>Wayside Farm: "there are three farm buildings on the west side of Watford Road". Google Earth shows <b>twelve</b> farm buildings plus additional structures, a farmhouse and a mobile home. It is an operating dairy farm with direct milk sales which will be destroyed if the buildings are redeveloped. Your Appraisal ignores this and thus is wrong in stating, without qualification, that housing would help the local economy and encourage provision of local services.</p>
Include files	
Number	Question 46
ID	LPIO11834
Full Name	peter faulkner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Landscape:-</b> The fields at Wayside Farm rise steeply above Watford Road and are visible from a wide area to the south and east. The entire character of the southern approach to Kings Langley will be radically changed by housing on Wayside Farm.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11835
<b>Full Name</b>	peter faulkner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Village character:-</b> Kings Langley has retained a village atmosphere and community and, until now, this has been respected in planning policy to prevent coalescence with Apsley/Hemel Hempstead. In the same way development has not been allowed to extend south to the M25/A41 by-pass junction. Development on the scale now proposed will completely destroy any semblance of a village and turn Kings Langley into an integral part of Hemel Hempstead New Town.</p> <p><b>Traffic:-</b> I have occupied 49 High Street from 1976 and recall the relief when the A41 by-pass was opened. Since then traffic volumes have steadily increased to the extent that in the mornings and evenings long traffic queues extend from the M25 north along the High Street. Capacity does not exist for the inevitable increase of traffic generated by the development of the Green Belt sites.</p> <ul style="list-style-type: none"> <li>The concepts of housing development on the Green Belt sites in Kings Langley disregard the policies and statements in the government white paper "Fixing our Broken Housing Market".</li> </ul> <p>Your Site Appraisals are discredited.</p> <ul style="list-style-type: none"> <li>You fail to specify what infrastructure will be provided to accommodate additional housing, traffic</li> </ul> <p>The impact on the 'village' community will be severe and irreversible.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11836
<b>Full Name</b>	peter faulkner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	There can be no justification for destroying a functioning dairy farm that serves the local community.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11840
<b>Full Name</b>	DEREK BROMLEY
<b>Company / Organisation</b>	Bidwells
<b>Position</b>	Partner
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We act on behalf of Felden Park Farms, the owners of the land identified as HH-e1, Potential Employment Land and which appears in each of the Options. The reference in the Issues and Options provides that 'In order to meet local needs and ensure a prosperous economy going forward, it would also be prudent to allocate some further employment land east of the A41 at Two Waters, Hemel Hempstead'.</p> <p>The land was submitted to the Council in the Call for Sites.</p> <p>The owners support the proposed employment allocation and in this connection have engaged a specialist consultant team to advise on a range of issues and design solutions to inform the nature of the development. These will be provided to the Council when available.</p> <p>In terms of delivery of the site, it is in single ownership. However, the shareholders of Felden Park Farms Ltd also have direct association with a property investment company which has the financial capability of carrying out the development.</p> <p>The type of local employment accommodation envisaged would be flexible units to meet the needs of a wide range of smaller enterprises for light industrial, offices or warehouse/distribution. The development would take a similar form to Chancery Gate. The access to the site would be from Two Waters Way.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11841
<b>Full Name</b>	EMMA AND MARK ABBS
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Further to your request for views on Dacorum Borough Council's proposed options for key sites in Markyate, we wish to make you aware of a number of strong objections that we have with regard to further housing development in Markyate, and specifically to Pickford Road.</p> <p>We have specific objections as follows:</p> <p><b>Detrimental impact upon residential amenities and the environment</b></p> <p>The Dacorum website says that "Dacorum is renowned for its heritage and historic townscape, including over 2,000 listed buildings and 25 conservation areas. There are also 30 scheduled ancient monuments and four registered historic parks and gardens".</p> <p>Planning legislation makes it clear that local authorities should give "special attention" to those areas and their enhancement. One of the main purposes is to preserve and enhance the character of the area and is a very important aspect of conserving the built environment.</p> <p><b>Dacorum's Local Planning Framework - 25 September 2013</b></p> <p>The Dacorum Core Strategy is to anticipate and manage change in Dacorum over the years to 2031. It needs to balance the need for new development and infrastructure against the need to maintain the environmental assets and unique character of the borough.</p> <p>There have been many new developments in Markyate in 2015 and 2016 and planned in 2017 and the infrastructure has not kept pace with this development and is under great strain. Markyate is a village of only 3000 residents and due to the age of the village the High Street is very narrow. It is single file due to parked cars and seriously congested at peak times during the morning rush hours and early evening. The very essence of the village is being destroyed by these continued developments.</p> <p>Traffic and access to Pickford Road is always chaotic during the morning rush hours with the school runs, people driving to work, many parked cars on the road and pavement parks and the historic village cannot cope with any more traffic. The village traffic system is already on its knees and this development will just lead to chaos and destroy the local village and its precious historic and natural environment. There is no public transport up Pickford Road and this would not be an option. The corner of High Street to Pickford Road is extremely tight and traffic backs up onto the High Street as larger vehicles struggle to turn. Pickford Road has become a single file road as so many cars are parked outside the houses, again causing significant queues.</p> <p>The development in the village has not been gradual but instead there have many large developments in a very short space of time. This is against Dacorum policy of managed and gradual development. The village now needs time to adapt and absorb these new developments.</p> <ul style="list-style-type: none"> <li>• Here are some recent examples in this rural and historic village with a population of c. 3,000:</li> </ul>

2015/2016 Hicks Road - 75 dwellings putting pressure. Hicks Road is a very large development that has brought unmanaged and chaotic car parking to the village. The proposed development will add to these problems.

2016 Dunstable Road - 40 dwellings

2017 The High Street - 3 dwellings

2015/16 - Abbey Wood - 34 dwellings

2016/17 agreed residential development of the site next to LAND TO CORNER OF FRIENDLESS LANE & PICKFORD RD, MARKYATE, ST ALBANS, AL3

Pickford Road 2016 - 3 dwellings

**Non compliance with POLICY 97 CHILTERN AREA OF OUTSTANDING NATURAL BEAUTY**

- The policy states: *In the Chilterns Area of Outstanding Natural Beauty the prime planning consideration will be the conservation of the beauty of the area; the economic and social well-being of the area and its communities will also be taken into account. Any development proposal which would seriously detract from this will be refused. Wherever development is permitted it will be on the basis of its satisfactory assimilation into the landscape.* This development will seriously affect the beauty of the area. The social well being of the villagers will be affected in many ways; eye sore, noise, congestion on Pickford Rd. A housing estate can not be 'assimilated into the landscape' as per policy 97 in an area of outstanding natural beauty.

• The hamlet of Cheverells Green, where My-h2 is proposed, has only a few substantial residential properties on substantial plots of land. It is mainly open fields, woodland, hedge-rows, and meadows. There is a huge amount of wildlife in the area and we have seen regularly on our walks, woodpeckers, badgers, deers, birds of prey, owls, bats and stoats. This development would serious damage their natural habitats and put them at risk.

It also states: *Every effort will be made to discourage development and operations that would adversely affect the beauty of the area. Landowners are encouraged to adopt the following planning guidelines which will contribute to the preservation and enhancement of the area. The Council will adhere to the guidelines whenever considering planning applications:*

It also states:

- *Development must not be intrusive in terms of noise, disturbance, light pollution, traffic generation and parking.* Pickford Road is already gridlocked at rush hour with school/work traffic with cars having to park on side of road. There are ongoing discussions currently regarding the High Street and how traffic should be managed, and also discussions regarding how to manage the congestion when dropping children off at the school. Schemes such as one way systems are being considered as the traffic situation has got so bad. In June 2016, Centrebus had to reroute their

	<p>buses to travel only one way on the High St as there was so much congestion and delay to the service. Any further development can only increase this problem.</p> <ul style="list-style-type: none"> <li>In summary, there would be a significant detrimental impact upon: <ul style="list-style-type: none"> <li>nature and the environment in this area designated as an area of outstanding natural beauty and the character of the area</li> <li>poor local and overcrowded infrastructure</li> <li>over-development in a small historic and rural village</li> <li>the loss of a valuable green space</li> </ul> </li> </ul> <p>We therefore believe that site My-h2 is not a site option and should be discounted and although My-h1 may not have the same detrimental effect on the environment, it will still have a negative effect on the local infrastructure and already crowded and over developed village.</p> <p>We would be grateful if the council would take our views into consideration when looking at these key sites.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11844
<b>Full Name</b>	Harold Taylor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>Hill Farm</b> This settlement is virtually a hamlet of Kings Langley. In view of the large area occupied by the secondary school, it would be logical to fill in this corner between the school and Chipperfield Rd. With improved road access, Chipperfield could be made more accessible if commercial facilities there could be enhanced, so avoiding descent into a congested High St.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11845
<b>Full Name</b>	Harold Taylor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<b>Rectory Farm</b> is already close to being a brownfield site. If Transition in Kings had acquired this site, application would have been made for a small-scale affordable housing development. There is an urgent need for young families to get on to the housing ladder.  Kings Langley is already on the way to becoming a prosperous, exclusive suburb with a substantial under-occupation of large houses occupied by retirees. A more balanced demography is desirable.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11846
<b>Full Name</b>	Harold Taylor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>Wayside Farm</b> Land on the station side of the canal is already well developed. There is scope to extend it further on the East side of the Watford Rd. if the problem of flooding could be rectified. This would make possible the creation of office space close to the rail station without encroaching upon the attractive agricultural land on the West side of Wayside Farm.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11847
<b>Full Name</b>	Harold Taylor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>The Trout Farm</b> This can hardly be regarded as a public amenity. It occupies a substantial plot between Rockliffe Avenue and the Link Road (which would provide easy access to the site). How deep is the lake? How much infill would be required for building purposes? The poor quality patches of woodland between Rockliffe Ave and the Link Road are presumably brownfield. This small patch could be used for housing. The footpath could be retained for access to the station, with grassed areas on either side.
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO11848
<b>Full Name</b>	Harold Taylor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>The High Street</b> The unceasing and increasing flow of traffic linking Hemel Hempstead with Watford has been partially alleviated by the creation of the bypass. It is at the heart of any proposed increase in housing density in Kings Langley. The pressure could only be relieved by diverting traffic away from it or by a drastic reduction in parking provision, to the great disadvantage of local traders and businesses.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11850
<b>Full Name</b>	SHEILA SHELDRAKE
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Our green belt around Kings Langley is so precious to us. We have lovely dairy farms selling raw milk and other farms growing crops or being used for grazing cattle or horses. The green fields and trees help to counteract the pollution from 3 major roads which surround Kings Langley: the M25 to the south, the M1 to the east and the A41 to the west. The green fields also prevent coalescence or merging of Kings Langley with Hemel Hempstead and Watford, enabling it to maintain its rural character with its historic, listed buildings, independent shops, cafes, pubs and restaurants. There are also areas of archaeological significance, wild life in abundance by the Grand Union Canal and some of the land falls within a flood plain.</p> <p>The traffic congestion through Kings Langley is horrendous during most of the day: ambulances and other emergency vehicles struggle to pass through the village, in spite of the dual carriage way the A41, which was built as a bypass 25 years ago. The traffic trying to enter the roundabout at junction 20 on the M25 is often stacked up to the High Street and traffic trying to pass through the village from the M25 queues for very long times during the rush hour. Traffic also queues back to the bridge over the Chipperfield Rd on the A41 when trying to access Junction 20. More houses will definitely mean more traffic congestion.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11872
<b>Full Name</b>	Councillor Alan Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As said before in previous Local Plan consultations and on other occasions, this site is located within the Ward/Parish of Kings Langley, and should have been considered as such.</p> <p>Rucklers Lane is the road which has the highest number of residents in Kings Langley, and exists in its own right as a separate settlement, as recognised by the Ordnance Survey, and evidenced by its own services, such as a Community Hall.</p> <p>Object strongly to this proposal as Hemel Hempstead would engulf the Rucklers Lane community, and Rucklers Lane would become the Southern boundary of Hemel Hempstead.</p> <p>Also, the local road network would not be able to take the traffic generated by such a scheme, regardless if access was provided via Rucklers Green or Pillings garage.</p> <p>Meanwhile, electoral mandates have been sought and won strongly since 1999 to prevent the development of Shendish, and releasing this green belt would break those specific promises.</p> <p>Reference is made in the site appraisal to the possibility of a smaller, undefined scheme on the Chiltern Hunt section of the land, which would effectively mean the whole of the Chiltern Hunt section, as it would not be possible to control any sub-development.</p> <p>The Landscape Appraisal in 2016 effectively stated the smaller development could be accommodated in the landscape with relatively less visibility, but this is not the case, because the development would still be clearly visible from both the Hemel Hempstead direction and the Bury Estate to the South East, across the Rucklers Lane tributary valley.</p>

	<p>Given the golf course does not represent open Green Belt, the smaller scheme would still involve the swallowing of Rucklers Lane; the adjacent roads could not take the traffic from even a smaller scheme; and a smaller scheme would again be in breach of electoral promises.</p> <p>Finally, this side of Hemel Hempstead will be experiencing quite a large amount of development as a result of the Beacon development and the Two Waters Masterplan, and so yet more development could lead to quite serious overdevelopment of the immediate area.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11873
<b>Full Name</b>	GEORGE ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am aware of the above proposal and I consider the effect of the proposals listed for Tring will have a devastating effect on what is a small historic market town in the Chilterns surrounded by the Chiltern Area of Outstanding Natural Beauty in addition to protected Green Belt land.</p> <p>As a previous resident and now-regular-visitor of Tring I know that the town is not equipped for any major new development and DBC should maintain the Green Belt, as is their obligation, and the character of Tring Town and the surrounding area.</p> <p>Tring already struggles with the lack of hard and social infrastructure e.g. traffic congestion through the narrow roads, lack of car parking in the Town and the railway station, inadequate transport links, schools, doctors surgeries and the like. How is it going to cope with more major development? How much of this development and the promises of improvement therein can DBC actually directly control and deliver?</p> <p>The proposals are insensitive and reckless adding to urban sprawl in a Town ill equipped to cope.</p> <p>DBC should look at other towns far better equipped and which have been designed and planned to cope with expansion e.g. Hemel Hempstead.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11874
<b>Full Name</b>	GEORGE ARMSTRONG
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am strongly opposed to the inclusion of site reference Tr-h5 - Land at Dunsley Farm, Tring for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is adjacent to Chiltern Area of Outstanding Natural Beauty</li> <li>• It is Green Belt providing a green corridor / buffer into town</li> <li>• It is the gateway site and visual opening to Tring town from the main access of the A41</li> <li>• The site was overwhelmingly rejected for development last time</li> <li>• The development will be unwanted urban sprawl</li> <li>• If the existing petrol filling and Tesco supermarket are maintained Tring has no need for further</li> <li>• Development of the these fields with their established and mature hedgerow supporting a variety of wildlife will be a tragic loss</li> <li>• Development can only add further to traffic congestion and pollution making the A41 more akin to a motorway and Cow Lane requiring rebuilding</li> <li>• No plans are apparent for changes and improvements to the hard and social infrastructure of the Town e.g. schools, doctors surgeries, buses, car parking, Tring station</li> <li>• It will be another loss of valuable and viable farmland</li> </ul> <p>It will be loss of a designated Wildlife site</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11880
<b>Full Name</b>	Councillor Alan Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Object to this proposal as it would involve extending Kings Langley in the direction of Hemel Hempstead and lead to the inevitable coalescence of the two settlements.</p> <p>The site is quite remote from the rest of Kings Langley and so would be quite unsustainable/generate a large amount of traffic on country roads.</p>



	The site alone would increase the size of Kings Langley by 10% and tip the village over the edge from being a village to being a town, i.e. destroy the village's character.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11881
<b>Full Name</b>	Councillor Alan Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Object to this proposal as it would involve extending Kings Langley in the direction of Hemel Hempstead and lead to the inevitable coalescence of the two settlements.</p> <p>Due to the existing strong green boundary along the A4251 on the western side of the plot, the development of the plot would also have a large impact on the openness of the environment between Kings Langley and Hemel Hempstead, and exacerbate the coalescence.</p> <p>The site may be located near the village centre, but is not situated near facilities such as a supermarket, so this proposal would still generate a significant amount of road traffic when it is already recognised that the A4251 is under stress, and would not be sustainable either.</p> <p>There is also some doubt over the amount of housing the site could achieve, given that the whole eastern side of the plot is unavailable due to the flood risk from the River Gade/canal.</p> <p>This site alone would also increase the size of Kings Langley by 5%, and help tip the village over the edge from being a village to being a town, i.e. destroy the village's character.</p> <p>Finally, electoral mandates have been sought and won strongly since 1999 to prevent the development of this site, and releasing this green belt would break those specific promises.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO11882
<b>Full Name</b>	Councillor Alan Anderson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>KL-h3 - Land at Wayside &amp; Broadfield Farms (100-1,000 Houses)</b></p> <p>Proposals have been vague, and the site appraisal states that this land is not recommended for Stage 2 assessment of Green Belt land, but the site has been included in this consultation, both in respect to Housing and Commercial development (see earlier re question 22).</p> <p>Object strongly, as it would not be possible to limit any development to small parts of the site, and the village would sprawl south-westwards to fill in the entire envelope within the A41.</p> <p>This would involve a massive amount of development, which would increase the size of Kings Langley by 50% and turn the village into a town, i.e. destroy the village's character.</p> <p>The proposal would also involve the loss of one of the few dairy farms left in the county.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11885
<b>Full Name</b>	Kathryn Sewell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Dacorum should focus housing development in Hemel Hempstead creating a vibrant mixed housing community with investments in infrastructure like other more successful New Towns have done. New Town development should be the primary focus for the housing targets in Dacorum, the small market towns and villages should be encouraged to retain their character which is part of the asset of this part of Hertfordshire. Indeed</p>

	Dacorum should be ensuring that previous housing targets in Hemel Hempstead are met and reflected in the re balancing of the targets for the District.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11886
<b>Full Name</b>	Kathryn Sewell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object to the proposal in the draft Dacorum Local Plan to develop on the Green Belt field adjacent to Ivy House Lane, site reference Be-h-3 and to the Dacorum new Local Plan in general.</p> <p>Objection 1: Infrastructure concerns</p> <p>Ivy House Lane is a quiet, predominantly single track, rural road. According to the site appraisal, it is suggested that the only additional infrastructure proposed by the promoter is 'cycle/footpath links.' To provide either a road or cycle way would be a significant investment, in order to allow appropriate access to either or both ends of the proposed development of 150 homes. Furthermore, the Council notes that "this is a rural lane that would require considerable upgrading to accommodate any new development." Whilst it has been suggested that alternative access may be feasible these are not specified in the public documents and are arguably not viable because;</p> <ul style="list-style-type: none"> <li>• Meadway is a private road, access unlikely to be possible.</li> <li>• Bank Mill Lane – access from the South – this would result in the need to widen two narrow canal and rail bridges. Bank Mill Lane does not have the capacity to enable additional vehicles to pass along it, it is already congested and challenging for two vehicles to pass side by side.</li> <li>• Potten End Road – access from the North - would greatly impact traffic on Gravel Path and the surrounding roads, as well as having a detrimental effect on the rural environment next to and including the Common. Accidents occur here both due to existing traffic and wildlife (notably deer).</li> </ul> <p>Objection 2: Provision of public transport</p>

	<p>None of these roads is near a bus stop, or footpaths with easy access to the town or railway station, providing further evidence that the site is ill-suited for development. Ivy House Lane is a steep hill, and in adverse weather conditions it frequently floods rendering “the dip” impassable.</p> <p>Objection 3: Density of housing</p> <p>I do not accept the arguments that the field in question should be removed from Green Belt and ask that this be considered in detail by the Council. The area is currently low-density in terms of housing, and is not an appropriate place to introduce such dramatically increased density of housing.</p> <p>Objection 4: Environmental concerns</p> <p>This is an area of natural beauty and a habitat for local wildlife. Developing 150 homes here would impact natural wildlife habitats detrimentally.</p> <p>Objection 5: Dacorum development plans</p> <p>Looking at the location of other proposed development sites, in both Berkhamsted &amp; Dacorum, it is clear that the Ivy House Lane site will offer a much poorer return on infrastructure development than other proposed sites. For the addition of up to 150 houses, and probably fewer in such a constrained valley site very significant infrastructure expenditure would be required. By contrast, developing larger sites elsewhere would result in much lower infrastructure spending per housing unit. It would not be good value for money to develop this site.</p> <p>The local infrastructure of the town would not cope with the addition of this number of new properties; school places, station parking, town congestion at peak travel times is already at maximum capacity, adding volume of properties in an area where residents will be reliant on private vehicles to access amenities will grind the town to a halt as well as add to congestion in this restricted part of the town.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11887
<b>Full Name</b>	Thomas Pedrick
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>I am writing to express my objection to the proposal in the draft Dacorum Local Plan to develop a small agricultural field on the Green Belt adjacent to Ivy House Lane, site reference Be-h-3.</p> <p>The main reason for my objection is that I do not believe that the infrastructure requirements linked to the addition of 150 houses to a quiet rural road have been adequately thought through. The site appraisal suggest that the only additional infrastructure proposed by the promoter is 'cycle/footpath links.' However, Ivy House Lane is currently a rural lane with no footpath and mostly only single-track, and would require significant investment in order to allow appropriate access to either or both ends of the proposed development. The Council's own notes on this topic argue that "this is a rural lane that would require considerable upgrading to accommodate any new development."</p> <p>The promoter has apparently suggested that an alternative access may be feasible – but this has not been specified in the public documents. I believe that access through Meadway is unlikely to be possible, as it is a private road; increasing access from the south (Bank Mill) would be prohibitively expensive given the need to widen not one but two single-track bridges, one over the canal and one over the railway. Increasing access from the north, i.e. from the Potten End road, would have severe knock-on effects to traffic on Gravel Path and the surrounding roads, as well as a detrimental effect on the rural environment next to and including the Common.</p> <p>None of these roads is anywhere near a bus stop, which provides further evidence that the site is ill-suited for development. The hill between the site and town is so steep that it stops all but the most energetic cyclists from being able to cycle up it. The area is currently low-density in terms of housing, and is not an appropriate place to introduce such dramatically increased density of housing.</p> <p>More broadly, if you look at the location of other proposed sites for development, in both Berkhamsted and further afield in Dacorum, it is clear that the Ivy House Lane site will offer a much poorer return on infrastructure development than other proposed sites. For the addition of just 150 houses, and probably rather fewer in such a constrained site, very significant infrastructure expenditure would be required. By contrast, developing larger sites elsewhere would result in much lower infrastructure spending per housing unit. It would not be good value for money to develop this site.</p> <p>I trust that you will take these and other objections into account and adjust your planning accordingly.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 46</p>

<b>ID</b>	LPIO11888
<b>Full Name</b>	Justine Pedrick
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to you to object to the proposed development at the top of Ivy House Lane in Berkhamsted. Clearly, there hasn't been sufficient research of the implications to believe that it is a viable option and although there are many concerns, environmental and transport implications are the most worrying.</p> <p>Ivy House Lane is a semi-rural lane which is a single access so it simply couldn't cope with the additional traffic. There is no viable option that would enable the site to accommodate the additional traffic. To traffic into Berkhamsted, Ivy House Lane leads onto a narrow railway bridge, and then onto either George Street/Ellesfield Road or Bank Mill. These roads always are jammed with parked cars (linked to the densely populated street with terraced houses and their proximity to the town and railway station) which means access is already very challenging. This morning, I was stuck for 20 minutes behind a Tesco Groceries small delivery van because it couldn't squeeze past the cars and every day, there is chaos as cars meeting from opposite directions have to reverse and negotiate passing each other on the crowded narrow streets. Action already needs to be taken to address the problems with traffic on these roads. It is ludicrous to do anything that would increase the traffic on these roads which a proposed development of 150 houses on Ivy House Lane would do.</p> <p>The environmental impact is also a grave concern. Ivy House Lane is opposite precious Greenbelt land and adding additional buildings, lighting and infrastructure would cause considerable damage to this semi-rural area.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11889
<b>Full Name</b>	Mr & Mrs Wilson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We have lived on Station Road, Tring for over 40 years; during which time we have experienced the opening of

	<p>the A41 dual carriageway. As a result of this - and with the improvements to the rail service from Tring Station - there has, as you know, been a huge increase in the traffic up and down Station Road and Cow Lane. This not only applies to cars, but large numbers of heavy trucks taking a through route to Dunstable and Luton.</p> <p>Additionally, we are on the flight paths of Luton and Heathrow where, once again, the number of aircraft has seen a dramatic increase.</p> <p>As a result of all these changes, the area has suffered considerably from the increase in noise and pollution.</p> <p>Parking at Tring Station is already under pressure, with people parking off site in Beggars Lane and in the entrances to fields. In Tring itself, parking is at a premium, with car parks sometimes all full. This is at times, can apply to the Tesco Supermarket.</p> <p>Tring is an historic town, in an area of outstanding natural beauty, and is at risk of being destroyed by any large increase to the housing population.</p> <p>It must be the duty of all councils to not to only protect towns such as Tring for future generations, but to persevere the surrounding countryside.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11935
<b>Full Name</b>	Janet Mason
<b>Company / Organisation</b>	Berkhamsted Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Be-h1; Land south of Berkhamsted</b></p> <p>A significant loss of Green Belt here would create urban sprawl, contrary to one of the main purposes of the Green Belt. Currently there is a strong Green Belt boundary which forms a clearly defined and defensible limit to the built-up area. In its present open and undeveloped condition, this site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment. An important transition area between the town and open countryside would be damaged.</p> <p>Much of the development here would be highly visible, being on a prominent ridge top location. In particular it is likely to be visible from the AONB, affecting its setting</p> <p>The site has a poor relationship to existing town centre services and facilities, employment land and the railway station. The distance from the town centre and the ridge top location would discourage walking and cycling. Consequently, large-scale development would place</p>

significant pressure on the local highway network, particularly Swing Gate Lane, the

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

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

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

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

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

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

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

The ridge top location would encourage car usage. Increased car use, as well as leading to growth in the level of greenhouse gas emissions, would increase the congestion problem in Berkhamsted. The location at a distance from the town centre would discourage walking and cycling: exacerbated by the steep gradient between the town centre and the site, which make walking and cycling difficult. There will consequently be a cumulative negative impact on Berkhamsted infrastructure. In



particular there is inadequate capacity on Shootersway: the impact of any development on the capacity of this road, Cross Oak Road, the junction with Kings Road, and Kings Road itself must be assessed alongside the cumulative impact of other proposed developments along Shootersway and to the west.

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

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

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

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

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

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

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

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

A bus service is unlikely to be viable. Berkhamsted bus routes have declined in recent years. There would therefore be an increase in car usage, congestion and pollution. There is a poor relationship to town centre services and facilities, employment land and railway station.

Public transport cannot be used and walking and cycling is not viable given the steep gradient and distance to the local centre. Parking availability at the centre of Northchurch is already insufficient.

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

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

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

This site falls within an area of Archaeological significance.

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

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

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

The site is close to the Chilterns AONB and would negatively impact on the setting. The site is too small to offer scope for additional town-wide leisure space.

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

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

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

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

The site is too small to offer scope for additional town-wide leisure space. It is a site of archaeological significance.

The site lies in a zone of flood risk.

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

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

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

The density is too high for the neighbouring Character Area.

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

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

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

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11981
<b>Full Name</b>	Dee Sells
<b>Company / Organisation</b>	Markyate Parish Council
<b>Position</b>	Parish Clerk/ RFO
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes</b></p> <p><i>Markyate Parish Council responded fully to this question when asked about this in the very first Question.</i></p> <p><i>[Response to Q1: Markyate Parish Council replied to the earlier Background to the Sustainability Appraisal/Strategic Environment Assessment earlier in the year, but our response seems to have been missed out. Our concern is with the two assessment sites in Markyate</i></p> <p><b>My-h1</b> <i>This is in or running off into the valued chalk stream, the river Ver. Flow is likely to increase when the planned pumping from the source at the Lynch, Kensworth occurs. The water meadows of the Ver between Markyate and St Albans is supposed to be protected. It is far too far from the village centre-extending the ribbon development that is not desired – and will create an isolated housing development attractive for commuting from the village using the large variety of routes by car. The open country and local walks are there now , it does not need more housing to make them available – quite the reverse. Access to the village facilities is not good, the bus service is very infrequent and only goes one way now to ease congestion in the village, which has become a giant car park. Not only do the new houses already built under current Local Plan have insufficient parking, the village is used for car sharers to meet and leave cars for the day and holidaymakers going to Luton airport park for free for one or two weeks, using taxis for the last part of their journey. Jobs were driven from the village by the Hicks Road development, new houses here would just suit commuters. Affordable housing for local people would not be practical as the occupants would find little local work and are cut off by the distance from the centre.</i></p> <p><b>My-h2</b> <i>Save from the location on a hill on the outskirts of the village, as opposed to the Ver flood plain on the outskirts of the village, the arguments above apply. Large properties on large plots would probably be popular, certainly affordable housing occupants would be isolated, particularly if they could not afford a car, and if they could it would only add to the congestion through the village and be another car with no parking available in the village centre.</i></p> <p><b>What needs to be amended.</b> <i>Markyate has already had to absorb its full share of development from the current local plan. One look in the evening would demonstrate what a detrimental effect the huge influx off cars has had – a giant car park, with parking in the many narrow roads like George Street making Emergency Access almost if not completely impossible. In Hicks Road, cars are parked all the way along the front of the new Square and under the upper parts of the building completely on the footway – where the still non-existent new surgery was to be located.</i></p> <p><i>Markyate does not have an adequate bus service for any worker to depend on it to go to work. The job</i></p>

*opportunities within the village are very few. Building for commuters needs to be near to a transport hub – railway station, tube station or even a centre with a frequent bus service which will permit the commuter to make the ongoing journey to and from work.*

*Having committed to preserving the Green Belt and protecting the AONB, both these development sites fail.]*

*[Response to Q11 included:*

*The Parish Council have not consulted with the landowner, but do see a small development of affordable housing, preferably Council housing to be really affordable, at the approach to the village along Buckwood Road from Studham. A wide road off on the left immediately before the first houses leading to a large turning/drop-off area before the Village School would stop the school traffic from passing through the housing estate and give access to coaches and other large vehicles visiting the school. We would envisage the housing to be on the left of the road. The right side of the road could be used to provide access or safe parking for the houses off Cowper Road, economics might call for more houses too, but only for local use, and affordable.*

*The Core Strategy did seek to provide a new Care/Nursing Home for Markyate. Caddington Hall is in our Parish and has recently been closed by Mid Bedfordshire Council and the site has been sold on. This could provide an excellent brown field site for a new Care Home for Markyate. The old Caddington Hall provided pleasant, peaceful rural accommodation for residents who had no need to travel daily, as well as local jobs. It would not be an appropriate site for general housing as it is outside the village core and unsuitable for accessing work without a car.]*

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11997
<b>Full Name</b>	CAROL FUGE
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to strongly object to the redevelopment of Wayside Farm.</p> <p>Please, please, please do not build on our precious green belt.</p> <p>This is our legacy to the next generation &amp; beyond.</p>

	<p>Please consider the long term effects on the environment, the wildlife &amp; the sincere feelings of the local community.</p> <p>There really must be other sites, (brown belt) that can be used for rebuilding homes &amp; therefore not using our precious green belt.</p> <p>Rather than write a lengthy email, stating the many, many reasons not to build, I just implore you from the bottom of my heart, to save this beautiful corner of Kings Langley, used for the benefit of the local residents &amp; the wider community. For my future grandchildren &amp; for yours too.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO11998
<b>Full Name</b>	HENRY ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am aware of the above proposal and I consider the effect of the proposals listed for Tring will have a devastating effect on what is a small historic market town in the Chilterns surrounded by the Chilterns Area of Outstanding Natural Beauty in addition to protected Green Belt land.</p> <p>The town is not equipped for any major new development and DBC should maintain the Green Belt, as is their obligation, and the character of Tring Town and the surrounding area.</p> <p>Tring already struggles with the lack of hard and social infrastructure e.g. traffic congestion through the narrow roads, lack of car parking in the Town and the railway station, inadequate transport links, schools, doctors surgeries and the like. How is it going to cope with more major development? How much of this development and the promises of improvement therein can DBC actually directly control and deliver?</p> <p>The proposals are insensitive and reckless adding to urban sprawl in a Town ill equipped to cope</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12001
<b>Full Name</b>	HENRY ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes</b></p> <p>I am strongly opposed to the inclusion of site reference Tr-h5 - Land at Dunsley Farm, Tring for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is adjacent to Chiltern Area of Outstanding Natural Beauty</li> <li>• It is Green Belt providing a green corridor / buffer into town</li> <li>• It is the gateway site and visual opening to Tring town from the main access off the A41</li> <li>• The site was overwhelmingly rejected for development last time</li> <li>• The development will be unwanted urban sprawl</li> <li>• If the existing petrol filling and Tesco supermarket are maintained Tring has no need for further</li> <li>• Development of these fields with their established and mature hedgerow supporting a variety of wildlife will be a tragic loss</li> <li>• Development can only add further to traffic congestion and pollution making the A41 more akin to a motorway and Cow Lane requiring rebuilding</li> <li>• No plans are apparent for changes and improvements to the hard and social infrastructure of the Town e.g. schools, doctors surgeries, buses, car parking, Tring station</li> <li>• It will be another loss of valuable and viable farmland</li> </ul> <p>It will be loss of a designated Wildlife site</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12002
<b>Full Name</b>	JOHN WOOD
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my strongest possible objections to the proposal for developments, your references Tr-h1, Tr-h4 and Tr-h5, namely the proposed devastation of green land to the east of Tring to no advantage of the inhabitants of Tring.</p> <p>Tring is a historic, some might say, ancient traditional market town and the proposed, so called developments, would permanently and irrevocably destroy the nature of Tring. It is self-evident that such wanton vandalism would not be reversible.</p> <p>Currently the infrastructure of the town is barley sufficient for the existing population let alone to the result</p>

	<p>of increasing the numbers of houses by hundreds. Specific areas of concern would include, for example, parking serving the town centre, sometimes it being impossible to park, parking at the Tring Station, often impossible to park, Doctors surgeries under severe pressure due to the number of patients, schools under pressure due to numbers of pupils, the largest supermarket Tesco also has parking and customer through-put limitations.</p> <p>The lovely and historic High Street is straining to cope with the current demands of the volume of traffic, significantly increasing the local population could easily result in the High Street becoming an almost permanent traffic jam. Furthermore the flourishing sports clubs in Cow Lane cause localized traffic jams when competitions occur and adding additional building off Cow Lane would only exacerbate matters and severely increase the likelihood of children being injured or worse by car accidents. Also the junction of Cow Lane and Station Road has been the site of numerous car accidents and it follows that further complicating the road layout with your so called development Tr-h4 would significantly increase the likelihood of future fatalities.</p> <p>The value of the green land around Tring cannot and must not be ignored, it is an integral component of the nature of an historic town and should never be taken for granted nor vandalized.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12003
<b>Full Name</b>	JOANNE BANKS
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to make some comments regarding the proposed development on the Green belt in and around Kings Langley.</p> <p>Whilst I appreciate that the council has to fulfil obligations to provide a number of new houses the proposed developments if they go ahead have the potential to completely change the character of a much loved village, something that can never be reversed.</p> <p>but object to any further development of the green belt as it would result in an overdevelopment of the area, put too much strain on local roads (already struggling with increased traffic) and other local amenities such as doctors, schools etc</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12005



<b>Full Name</b>	JOANNE BANKS
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am also very concerned that if the Shendish development goes ahead there is proposed access from Rucklers Lane. This road is already extremely well used and difficult to navigate at busy times, further considerable traffic will cause chaos, as it is only a small residential road not a main road.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12007
<b>Full Name</b>	MARTIN WELLS
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Shendish (site ref HH-h3) is part of Kings Langley not Hemel Hempstead, and should not be included in any development proposals for Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12008
<b>Full Name</b>	MARTIN WELLS
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Kings Langley should not be considered part of the Dacorum Borough Council's Plan for the following reasons</p> <p>The village of Kings Langley would be in danger of losing its character and identity. Kings Langley should not become part of Hemel Hempstead or Watford.</p> <ul style="list-style-type: none"> <li>The village centre already struggles to cope with the existing volume of traffic. Emergency service vehicles often have difficulty getting in and out of the village. Any additional housing will inevitably</li> </ul>

	<p>lead to more cars and make the situation worse. It would not be possible to widen the existing road.</p> <p>Given the village's close proximity to the M25 and A41, the Green Belt around the parish should not be considered for development. The local green spaces are essential to protect the environment from both noise and air pollution</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12009
<b>Full Name</b>	MARTIN WELLS
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In particular Wayside Farm should be excluded from development plans. The farm has only 1 of 2 Jersey herds in the county and is an important part of the village.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12010
<b>Full Name</b>	JOHN WEST
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I just wanted to write and say that as a 30 year resident of Kings Langley I am vehemently opposed to the proposed new Green belt development sites in Kings Langley.</p> <p>It has already hugely grown in size, far in excess of the natural increase of the local population. The character of the village is being totally destroyed. Undermining its entity as a village, especially with possible development at Shendish and the already completed massive developments all along the canal at Apsley.</p> <p>The village is absolutely grid locked at morning rush hour often taking forty minutes to an hour to reach the M25. We already have a by-pass which is also filling up rapidly at these times. What madness to further increase the number of people. Whilst there are lots of areas in Hertfordshire that are not nearly as crowded, I am sorry our MPs have not done more to resist government calls for more housing in this area.</p>

	<p>There is great anger in the village at having this development thrust upon us. It is totally undemocratic.</p> <p><b>I personally would never vote for a councillor or MP that supports or allows this scheme</b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12012
<b>Full Name</b>	SUSAN ARUNDEL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I live in Green Lane which (when I came to the village in 1982) was still a lane with only a minimal number of vehicles except at rush hour when there were more. Over the years the Lane has become a cut through because the High Street is so congested. There are also huge pantechnican lorries and smaller lorries which now use Green Lane. The pantechnicans usually come, towards the High Street, down Green Lane and find that they cannot negotiate the 'Well' at the end of Green Lane and have to back up and turn into Nye Way to turn around. Traffic is already a problem as there is parking on the left hand side (sometimes on the right too) and it causes problems for cars trying to get through to go to the High Street.</p> <p>The 335 dwellings , nursing home, pre school facility and allotments plus open space, <b>will add a huge number of vehicles to Green Lane as they all have access onto it. (Just the houses would add 670 cars</b> (not including other family cars) and even more cars at busy times with the all other facilities.</p> <p>If the full plan with entrances onto Green Lane was to happen the whole character of the road would go completely.</p> <p>The land is I believe, <b>in a green belt area in all cases</b>, and that is totally unacceptable. It conflicts with Dacorum's Core Strategy.</p> <p>Great Britain is known for its green belt areas and we are in the foothills of the Chilterns which is an area of Outstanding Natural Beauty. We are a Village not a town and have had a considerable amount of infilling and new builds already. Green Belt should be sacrosanct.</p> <p><b>The Infrastructure of Bovingdon is at breaking point</b> as nothing has been done to help the village cope with all the work already done and <b>electricity, water are at breaking point.</b> We have had leaks in Green Lane and the village currently has quite a few power cuts. <b>The School is at capacity</b> and certainly <b>cannot cope with any more children...more buses in Green Lane? A Pre School will not help.</b></p>

	<p>The High Street ....A total nightmare nearly all the time. Parking everywhere but not enough, by a long way, to cope now! I calculate that with all the houses (x2 cars) (other family not included) and the pre school, nursing home, community buildings and open spaces could add an <b>extra 1,000 to 1,500 cars onto Bovingdon's already congested High Street, Chesham Road and Green Lane!!!</b> Impossible. Traffic is already spilling into the lanes around Bovingdon which are mainly one track.</p> <p><b>The Village Doctors and Dentists are at or near capacity.</b> The Longmeadow Surgery is part of the Kings Langley surgery. Kings Langley also has similar problems with the amount of houses in the plan. Does that mean Bovingdon may close as Kings Langley is the main surgery. There is no room to expand the surgery in Bovingdon.</p> <p>Many homes were flooded in September 2016. The water comes from the Airfield underground and, added to the surface water caused serious flooding in Green Lane near the well. Nothing has been done to sort out this problem and people who have only recently got back into their homes in the village are extremely worried. The drainage, sewer system cannot cope now.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12013
<b>Full Name</b>	SUSAN ARUNDEL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>Bov-H2 How can you improve access to the countryside when there are footpaths through that countryside already!</b>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12014
<b>Full Name</b>	SUSAN ARUNDEL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>The only solution that I can see is to build on the airfield (make it a separate village with full infrastructure.</b> This would make the most sense. The road down to Bourne End would take the traffic away

	from Bovingdon. This would also stop the bain of our lives...all the things that have happened, or we have had to stop happening, on the Airfield over the years I have lived here. Concrete Crushing, The Market (now every Saturday and Bank Holidays), the micro lights, Raceways with its loud speakers which were still loud in Green Lane), the skidding cars, fireworks, even an illegal fight a week ago which caused residents in Bovingdon hours of traffic jams just to get into Bovingdon.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12019
<b>Full Name</b>	MALCOLM AND SUSAN RAYNER
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As long term residents of Bovingdon we would like to register our objection to the proposal to provide a further 360 homes on top of the 90 homes already in the current Plan.</p> <p>Our objections are based on the following reasons:-</p> <p>1) The plan to develop Green Field sites contradicts the Dacorum Core Strategy to "minimise impact on Green Belt and safeguard the countryside "</p> <p>2) Infrastructure is already at breaking point.</p> <p>Increasing homes without addressing the village's major traffic congestion and parking problems will greatly increase these problems exacerbating their negative impact on local businesses, air quality road safety and quality of life.</p> <p>3) Community services are already at breaking point.</p> <p>Bovingdon Academy is nearly at full capacity with no room to expand. Village doctors, dentists are at or near capacity and are unable to accept a large increase in the number of patients.</p> <p>4) Environmental Impact of such a dramatic increase in homes, population and cars will lead to more pollution. Loss of Green Belt , increased water abstraction, the impact on soil quality, drainage/sewer system, increased flood risk particularly at the Ryder Memorial.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12021
<b>Full Name</b>	WILLIAM & MARSHA FACEY
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We wish to register our strong objection to Dacorum Borough Council's proposals for Berkhamsted</p> <p>Berkhamsted's topography makes it totally unsuitable for an expansion on the scale proposed. It sits in a steep-sided valley with very constricted road access from the sides, which is already leading to worrying congestion and pollution along the main road and adjacent streets. The plan to build a new multi-storey car park at Waitrose, so far from alleviating the traffic problem, will in fact intensify it by attracting yet more traffic into the centre. The addition of 2,000+ households will massively increase the problem.</p> <p>We see no sign that this problem is addressed in the current plans. Nor that the water supply problem has been considered: DBC will be aware of the water shortage in parts of Berkhamsted only this summer. Also, there is little sign that the provision of educational and healthcare facilities for all these extra people has been given due consideration.</p> <p>The character of the market town will be irreversibly damaged by a sudden increase in population, along with the quality of life so valued by existing residents. The plans do not recognise Berkhamsted's distinctiveness as a historic town, and instead seem to be aimed at turning it into a satellite of Hemel Hempstead – whose High St was not so long ago voted the ugliest in Britain.</p> <p>The proposed invasions of Green Belt land in one of the prettiest parts of England have to be resisted.</p> <p>These plans suit only developers. Having made a quick profit, they will leave the local community, and DBC, to sort out all the problems caused by such ill-conceived housing expansion</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12023
<b>Full Name</b>	WILLIAM & MARSHA FACEY
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>And it surely shows ignorance of local conditions to propose extending the Bank Mill Lane development along the meadow that is in effect the flood-plain of the Bulbourne.</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO12025
<b>Full Name</b>	ROB RIGBY
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In general the plans talk about the provision of new jobs, but what are these new jobs other than building, which is short term and how could such development improve the local economy when the majority of residents commute into London, Kings Langley is already a thriving area. There is a reason why the Kings Langley area is an attractive place in which to live, because of the surrounding greenbelt land, without which people would choose to live elsewhere. It would appear Dacorum Council are attempting to improve the marketing aspirations of Hemel Hempstead and using a new housing strategy to attract people to the area, which has a serious impact on rural areas.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12028
<b>Full Name</b>	ROB RIGBY
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am concerned and firmly against any development on the following sites:</p> <p>Shendish Manor Estate - 900 houses + Primary school (site ref HH-h3)</p> <ul style="list-style-type: none"> <li>• Wayside Farm – Offices and up to 2000 houses (site ref KL-h3)</li> <li>• Hill Farm – 280 houses (site ref KL-h1)</li> <li>• Rectory Farm – up to 200 houses (site ref KL-h2)</li> </ul> <p>Green Belt land provides the “lungs” around Kings Langley village. It could be argued that the proposals from DBC for housing to be built on these four Green Belt sites breaches all of the five green belt safeguards. The loss of countryside and valuable farmland is fundamental to the future of not only Kings Langley and the surrounding areas but the future of the UK on a national scale for the following reasons:</p> <p>Once built on, the land is lost forever.</p>

- The decision to include working farmland in the Planning review could remove agricultural opportunities for future generations.
- The farms circling Kings Langley add to its character as an historic village, dating back centuries.
- Submitting to urban sprawl defeats the whole objective of Green Belt protection. The erosion of Green Belt land surrounding it would mean it may lose its village heritage and identity.
- The Green Belt helps preserve the characteristics of Kings Langley village.
- Wayside Farm is a local business producing local produce for the local area, which has a number of exciting opportunities which will be lost.

There are alternatives to development on greenbelt land, the development of brownfield sites is essential to suburban regeneration, which must be considered before planning any development on greenbelt land, however there appears to be a lack of foresight by Dacorum Council in identifying any appropriate land for development.

#### **Overall Effect of Development**

Transport links at the south of Dacorum are **already** overloaded at peak hours. This means **any** further new building will add to existing congestion, and further reduce the attractiveness of the Borough. This in turn negatively affects housing forecasts.

- Recent increases in the population of Abbots Langley, the next village to Kings Langley who share our railway infrastructure have created additional pressures on the transport links at M25 Junction 19 & 20, and on the rail link to Euston. There is already major road congestion on all roads in both directions towards the M25 and into Apsley and Hemel. On trains, there is standing room only at peak hours and at weekends from Kings Langley to Euston, due to the large numbers of passengers boarding at stations between Tring and Apsley. Railway car parks are overflowing onto main roads especially at Hemel and at Kings Langley even after being almost doubled in size quite recently.
- Emergency services will continue to struggle to get through the traffic.
- The Nap surgery has had a significant increase in new patient registrations during 2016. This sharp increase has put the surgery under intense pressure already.
- There appears to be no provision for water resources, no doubt using existing reservoirs which will cause undue pressures during dry spells. Sewers are not designed for so many people. There are also flood issues especially at Rectory Farm, Hill Farm, Shendish and Wayside as there is no land for water drain or soak into. The Dacorum Local Plan takes no account of proposed



	<p>developments in Three Rivers where there has been significant housing development.</p> <ul style="list-style-type: none"> <li>• There is a proposed primary school at Shendish, however there are no extra provisions for secondary education, all local schools are already excessively oversubscribed. Where are the teachers coming from?</li> </ul> <p>The Dacorum Local Plan takes no account of proposed developments in Three Rivers where there has been significant housing development.</p> <p>There is a real possibility that if this encroachment continues we could be left with an urban sprawl from Watford to Hemel Hempstead which brings obvious environmental and social issues.</p> <p>I am also unsure how such development and increase in population will help to protect local visitor attractions such as Ashridge which is already being affected by significant increases in visitors</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12030
<b>Full Name</b>	JACK ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am aware of the above proposal and I consider the effect of the proposals listed for Tring will have a devastating effect on what is a small historic market town in the Chilterns surrounded by the Chiltern Area of Outstanding Natural Beauty in addition to protected Green Belt land.</p> <p>The town is not equipped for any major new development and DSC should maintain the Green Belt, as is their obligation, and the character of Tring Town and the surrounding area.</p> <p>Tring already struggles with the lack of hard and social infrastructure e.g. traffic congestion through the narrow roads, lack of car parking in the Town and the railway station, inadequate transport links, schools, doctors surgeries and the like. How is it going to cope with more major development? How much of this development and the promises of improvement therein can DBC actually directly control and deliver?</p> <p>The proposals are insensitive and reckless adding to urban sprawl in a Town ill equipped to cope.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12033

<b>Full Name</b>	JACK ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Yes</b></p> <p>I am strongly opposed to the inclusion of site reference Tr-h5 - Land at Dunsley Farm, Tring for the following reasons:</p> <p>It is adjacent to Chiltern Area of Outstanding Natural Beauty</p> <ul style="list-style-type: none"> <li>• It is Green Belt providing a green corridor / buffer into town</li> <li>• It is the gateway site and visual opening to Tring town from the main access of the A41 <ul style="list-style-type: none"> <li>• The site was overwhelmingly rejected for development last time</li> <li>• The development will be unwanted urban sprawl</li> </ul> </li> <li>• If the existing petrol filling and Tesco supermarket are maintained Tring has no need for further <ul style="list-style-type: none"> <li>• Development of these fields with their established and mature hedgerow supporting a variety of wildlife will be a tragic loss</li> <li>• Development can only add further to traffic congestion and pollution making the A41 more akin to a motorway and Cow Lane requiring rebuilding</li> <li>• No plans are apparent for changes and improvements to the hard and social infrastructure of the Town g. schools, doctors surgeries, buses, car parking, Tring station</li> </ul> </li> <li>• It will be another loss of valuable and viable farmland</li> </ul> <p>It will be loss of a designated Wildlife site</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12035
<b>Full Name</b>	CHARLES WELBORN
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the plans being thought of at the following locations.</p> <ul style="list-style-type: none"> <li>• Haslams Field</li> </ul>

	<ul style="list-style-type: none"> <li>• Berkhamsted Golf Range</li> <li>• Land at Ivy House Lane</li> <li>• Land between Durrants Lane / Bell Lane / Darr's Lane,</li> <li>• Land at Lockfield, New Road, Northchurch</li> </ul> <p>Land adjacent to Blegberry Gardens</p> <p>I have also noticed as we go around town, people are having to leave earlier for work and are getting home later as the volume of traffic over the last 2 years has increased. Emergency services are even finding it difficult and experiencing long delays due to volumes of traffic like Berkhamsted where they need to respond urgently but are caught up in traffic. Adding more homes to Berkhamsted will make Shootersway come to a standstill and mean people will have to leave earlier for their work and other events as the volume of traffic will be larger. Where will all the children go to school or nursery? Also the Doctors surgeries are struggling to take on more patients, and care homes are struggling to take on any more service users, how will adding more houses help these surgeries with waiting lists have more places so people can attend? My surgery we have to book appointments a week in advance. Does this not show you what pressures they are under. If you take natural habitat away then we will end up with no nature and for people to enjoy these magnificent plants, birds, insects and much more which you are destructing.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12036
<b>Full Name</b>	CHARLES WELBORN
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to you building houses on Haslams Field as this belongs to Berkhamsted School and was given to it in a covenant so the field should stay with the school.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12083
<b>Full Name</b>	David Wilyman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here

The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasize just a few of the most important points within that response.

Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

Standard BRAG response to Question 46. Please note full document is attached to Question 46

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-Header-DEC-2014-V1.docx> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable

location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition

the gradient between the town centre and the site may make walking and cycling difficult

- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and



then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase

to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about

- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be

widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative,

walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of ‘bus loop’ therefore not viable solution. Berkhamsted bus routes have

decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the

- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"

- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling



is accepted not to be a realistic alternative form of

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage

	<ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12085
<b>Full Name</b>	Mr and Mrs J and T Collison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I believe that the road that runs through the village and onto Apsley is a maximum capacity already and could not cope with all these extras vehicles.</p>

	Usually minimum of 2 vehicles per household. also why develop green belt when there are plenty of brown sites unoccupied.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12086
<b>Full Name</b>	Sheelah Wray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I disagree with development because it is covering everything with buildings, having a detrimental effect on the countryside and the wildlife.</p> <p>Not only that but surely we need more farms and farmers in the coming years so that as a country we can be more self sufficient.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12087
<b>Full Name</b>	Mary Hannaby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>We need our green spaces as somewhere for the local population to get fresh air and exercise. As a nation, with the increase in so many things being done electronically we are becoming increasingly indolent which is having a detrimental effect on both our physical and mental health. Take away the green belt and things can only get worse.</p> <p>The other extremely serious problem I can see, is that since our vote to leave the European Union, surely we are going to need our farms and farmers even more than we do now, as we need to increase our productivity and self sufficiency rather than diminish it by building over all our farms and farmland.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO12089
<b>Full Name</b>	Mrs Maria McHale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-h2 Rectory Farm. The roads in Kings Langley village are already overloaded, and additional traffic coming through the village cannot be accommodated. The historical importance of the village needs to be protected and the character of the village preserved. In effect if this development took place Kings Langley would cease to be a village and become a town, coalescing with Hemel Hempstead. People have chosen to live in Kings Langley precisely because it is a small village surrounded by beautiful countryside, and want to continue to enjoy the distinct character of the village and the health benefits of the beautiful green spaces. The DBC Core Strategy states "Protecting the character of our towns and villages, and that of important landscapes and countryside will also be important considerations". However the proposed plans will in fact achieve the opposite. Also no consideration seems to have been given to the fact that building on this land would pose a serious flood risk, and in my opinion this is therefore not a viable option.</p> <p>KL-h3 Wayside Farm. The farm is a valued integral part of the village community and is situated on Green Belt land. There should be no circumstances under which this land should be built on as this endangers the environment and the health of the community. The farm is also in close proximity to J20 of the M25 and the approach to this is already gridlocked with stationery traffic during peak times. It already takes me over 45-50 minutes to travel a distance of four miles to Watford, and all alternative routes are also blocked with congested traffic. The railway station in Kings Langley is also overloaded with commuters, and there is also insufficient parking to accommodate any increase in the number of train passengers. I cannot see how building upwards of a 1000 homes on this site could be sustainable with the current road infrastructure. This would also adversely affect air quality, whilst removing green space which is important for the wellbeing and the recreational pursuits of the village residents. The proposal to build more offices on this site is ludicrous, as there are already many empty office blocks in the area, which are no doubt unattractive due to the already congested traffic and difficulties in travelling to and from Kings Langley. Additionally, Kings Langley would cease to be a village, and would in effect become a large town coalescing with Watford. The Government's current policy is to not build on Green Belt land, and protect the green spaces surrounding villages so that there is no urban sprawl. I</p>

cannot therefore see why this site is being considered, especially when there are brownfield sites which could be developed and also underutilised commercial space in the area. The Core Strategy states the need to "make best use of brownfield land and the important principle of ensuring urban areas do not sprawl into other existing settlements undermining their distinct and separate identities". Why then is the exact opposite being proposed, especially with no regard to the inadequate infrastructure? In addition to the road system not coping, immense pressure would also be put on health and education services in the area. This option is not sustainable, and precious Green Belt land would be destroyed for ever. There should be no building on Wayside Farm.

HH -h3 Shendish. This is in the parish of Kings Langley and is not in Hemel Hempstead. The proposed building plans would mean that Kings Langley would coalesce with Hemel Hempstead and cease to be a village, and would just be absorbed into Hemel Hempstead town. The road infrastructure along Rucklers Lane and at the traffic lights junction is not capable of accommodating any increase in traffic. The addition of a school on the site would further add to the traffic congestion along a road which is only capable of taking single line traffic. Therefore for logistical reasons this site is unsuitable for development.

KL-h1 - Hill Farm. The proposed plan to build 280 houses plus a Secondary school on this site is unsustainable as this is too far out of the village centre and amenities, and the road infrastructure would not cope. DBC's Core Strategy states "Isolated development which has poor connections with local services and facilities should be discouraged", and I fail to understand why this site has therefore been proposed. Quite apart from the fact that this would destroy beautiful countryside, there seems to have been no consideration as to the logistical problems this would cause to the road network in the area, and already overloaded health services in the area.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12113
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Chiltern Society is a charitable body with 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our

	<p>role in the planning system is co-ordinated through a network of voluntary planning field officers and co-ordinators.</p> <p>The following is our initial assessment of the proposed sites -</p> <p><b>TRING</b></p> <p>Tring is being required to take much more than its share of housing. The development LA5 near the Cemetery has already been approved in principle and will probably be 240 houses.</p> <p>Option 1B is best for Tring with less development and no invasion of Green Belt according to the Plan.</p> <p>Option 3 would mean possibly 40% increase in the number of houses in Tring &amp; loss of Green Belt. Green Belt must be protected, as Aylesbury is growing enormously (27,000 new houses). Aylesbury will extend to Aston Clinton, and so Green Belt is needed to separate Tring.</p> <p>Green Belt is important on all sites: it gives a soft edge between urban and natural environment. It is necessary to retain Green Belt in order to appreciate the Chilterns AONB.</p> <p>Any significant increase in population in Tring would change the character of the town, and the infrastructure in the town centre is inadequate re parking, schools, doctors etc. If too many houses are built, there will be insufficient employment opportunities.</p> <p>Affordable housing is of the utmost importance. We assume this is mainly for rent, but Tring also needs Starter Homes to buy.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12115
<b>Full Name</b>	Denise Feasey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>I do not support the proposal to develop on green belt sites in and around Kings Langley &amp; Shendish. This would result in a devastating loss of farmland,</b>

**woodland, fields, footpaths, and wildlife. It would destroy the character of this beautiful historic village.**

Kings Langley attracts people who want to live as part of a community. The high street has shops and restaurants selling local produce for local people. It is a friendly and welcoming place. There is a real sense of living together and a collective pride in the village. The surrounding green spaces, conservation area and the canal are vital to the character of the village.

A mass of housing would be extremely detrimental to the character of the village; the boundaries between Kings Langley and surrounding areas will be blurred and this would effectively turn Kings Langley into a small town. I urge you to protect our village status.

It is a privilege to live in this village, we benefit from a calmer pace of life compared with the busy surrounding areas. It would be detrimental for the village to become a large urban sprawl, a dense mass of housing. Kings Langley needs to keep its distinctive character, not only for villagers but also for the many people who enjoy the benefits of visiting a village.

Kings Langley does not have the infrastructure for large scale growth:

- The Hempstead Road is already an accident black spot and increased housing, not only in Kings Langley but surrounding areas, will only serve to exacerbate the problem and this will lead to an increase in accidents
- The road leading out of the village to the M25 is increasingly more congested and will not have the capacity for the increased volume of traffic
- The roads in the high street will become so busy that shops will lose passing trade
- Key sightlines such as the view across the fields of the livestock, trees and skyline will be lost to a mass of houses and rooftops
- There will be reduced natural daylight for existing properties
- The mass of buildings and subsequent light pollution will mean that you will no longer get the stunning views of the night sky
- The existing green spaces which are rich with wildlife will be replaced by a dense mass of buildings
- Footpaths will be concreted over and there will be a devastating loss to the natural flora and fauna
- There will be a loss of habitat for existing wildlife; bats, muntjac and badgers frequenting surrounding areas
- Trees and hedgerows which soak up air pollution from the M25 will be destroyed
- There will be a huge burden on services such as the doctors and dentist. These practices are already challenged to meet the existing demand.

Kings Langley is under threat and it is time to act now to protect it rather than regret later. Please do not destroy the character of the village.

**Include files**

<b>Number</b>	Question 46
<b>ID</b>	LPIO12116
<b>Full Name</b>	Denise Feasey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Wayside Farm is such an important part of village life. The shop supports farmers who sell locally produced food and milk. Villagers will stand together to protect Wayside Farm and the green belt land that it is built on.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12118
<b>Full Name</b>	SUSAN DANIELL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In particular, I object to the proposed development on the Green Belt in and around Kings Langley and Shendish.</p> <p>Langley and Shendish.</p> <p>Even so, I have great concerns about the volume of new homes being proposed, wherever they may be sited within Dacorum Borough Council. The road and public transport network around Kings Langley is already at capacity, and any more traffic being generated from large scale housing and commercial developments would bring things to a standstill. Traffic for London and the M25 from places such as Bovingdon, Chipperfield, Tring, Berkhamsted, Hemel Hempstead and Apsley has to pass through the village of Kings Langley, and already the existing road network is not adequate.</p> <p>My job at North London Hospice in Finchley (for which I need my car to visit people at home) requires me to commute using the M25. Even if I leave the house by 7.30 in the morning, the traffic is already backed up from the motorway as far as Kings Langley High Street. What should be a two minute drive from Langley Hill to Junction 20 of the M25 is now often fifteen minutes. Petrol fumes are being pumped out into the atmosphere from the idling car engines to the detriment of the health and wellbeing of all.</p> <p>I remember when the Kings Langley by-pass was built. In fact my mother was one of the 'walkers' of the by-pass</p>



	<p>before it was opened. The by-pass was built to alleviate high volumes of traffic on the original A41 through Kings Langley High Street. Any benefit to the village from the by-pass has long since disappeared with the High Street at gridlock again daily during rush hours. Any development at Shendish would vastly increase this traffic congestion (whilst also losing for ever farmland, recreational land, land for sustainable and educational activities such as scouting, and rights of way which should be protected under National Planning Policy Framework 2012).</p> <p>Every weekday morning on Langley Hill the queue of cars and coaches travelling up to Kings Langley School, Kings Langley Primary School and the Rudolf Steiner School is often at a standstill and I have sometimes not even been able to exit the driveway to our house for several minutes until a gap in the queue is made available.</p> <p>Kings Langley has a fantastic heritage, once housing the preferred royal palace of several medieval kings and queens of England, including Edward I and Queen Eleanor, Edward II, and Richard II as well as the first Duke of York, Edmund de Langley. One of the scenes of Shakespeare's <i>Richard II</i> takes place in the gardens of the Royal Palace at Kings Langley. Much of the land that comprised the Royal Great Park such as that at Wayside Farm and Hill Farm can never be replaced once it has been built upon. Scheduled ancient monuments, amenity land and places for wildlife to flourish will be lost for ever. Wayside Farm is of great benefit to the local community, offering high quality farm products to local residents and visitors to the village and providing valuable educational opportunities to children and young people.</p> <p>Any large scale development risks Kings Langley losing this identity as a village with a royal heritage and becoming merged with Apsley and Hemel Hempstead; just another 'urban sprawl'.</p> <p>The only kind of development I think is feasible is that which uses brownfield sites and is eco-friendly and sustainable and which would include electric car sharing plans, such as that being proposed by the Kings Langley Community Benefit Society and the Transition in Kings (TIK) group.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12119
<b>Full Name</b>	SUSAN DANIELL
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	A pilot for this could be undertaken at the Rectory Farm site, where a small scale development of Passivhaus standard homes could be built upon the 1.1. acre footprint of existing farm buildings, while other innovative housing solutions could be explored, which don't require the permanent excision of the natural environment, such as the floating homes in a canalside marina as proposed by the Kings Langley Community Benefit Society. Such housing projects would ensure that the wildlife corridor provided by the land adjacent to the Grand Union Canal is preserved as an area of Outstanding Natural Beauty for all time, while at the same time providing local people access for community amenity and educational use.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12126
<b>Full Name</b>	FRANCES COX
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Proposed building plans for Bovingdon</b></p> <p>I have lived in Bovingdon for thirty five years and during that time have seen many changes, most notably the prison, car racing and the market on the airfield all of which have increased traffic flow and footfall. More recently the airfield has been used for film and TV productions. I have witnessed the village school go from strength to strength, the building of a wonderful library facility that benefits everyone, and the development of a range of shops that the village need to keep open. However, amenities important to a sustainable infrastructure the bank, the fire station, the petrol station have all closed.</p> <p>There has already been quite a significant amount of housing developments as a result of infilling. On Green Lane recent developments have seen three bungalows being replaced by seven large houses and one bungalow being replaced by four houses. Another development on Bovingdon Green has created more houses, and "The Bull" pub is now two residential properties. Each of these dwellings comes with more adults, more children and more cars. There is also the new retirement home (McCarthy and Stone) being built on Hempstead Road on the old Jaguar site. It is commendable that these buildings have been able to blend into the existing community. The Tesco development includes plans for several flats.</p> <p>Bovingdon has made a contribution to the UK housing problem.</p> <p>So with the above in mind that I feel we are being asked once again to consider plans; a decision which will tip the village into crisis.</p>

The whole proposal conflicts with Dacorum's Core Strategy to "minimise impact on Green Belt" and "safeguard the countryside". Once built on, the Green Belt will be lost forever

It seems completely inappropriate that the selection of four Green Belt sites is driven by individual land owners offering their land for sale with no consideration to the limitations of the area and infrastructure or the needs and wellbeing of the village.

Bovingdon already has major traffic congestion and parking problems. The B4505 is a busy road. Increasing homes without addressing the existing issues will make traffic congestion and parking far worse and exacerbate their negative impact on local businesses, air quality, road safety and overall quality of life. We have no fire service, we have no petrol station. With more inhabitants we would have more people travelling in cars for refuelling, more cars on the road, possibility of more calls to the emergency services and less chance of them reaching us because of the increased density of traffic. The lives of residents may be put at greater risk as a result of these proposed housing developments.

Community Services are bursting at the moment and struggling to meet the needs of existing residents. The village has an Outstanding Primary School and is at full capacity and with no room to expand. The village Doctors and Dentists are also near to full capacity. Any new inhabitants of Bovingdon would need to travel (by car, there is only one public bus an hour) out of the village for these services which would further exacerbate the traffic issue.

Presently there are around 1750 homes in Bovingdon. An additional 450 new homes would increase the village's total homes, population and cars by approximately 25%. This proposed dramatic increase in houses, population and cars would mean more pollution, increased water abstraction, there would be an impact on soil quality and enormous pressure put on the drainage/sewer system. In particular an increased flood risk around the Ryder Memorial.

The heavy rains and ensuing local flooding on September 16th, 2016 resulted in the village to be on the national BBC news. The photographs attached show my back garden on the morning of Friday September 16th. The garden has flooded before and indicates the drainage/sewer system is under stress. Rymill Close is at the back of Hamer Close – yet another example of infill housing. My neighbours at No 8 were relocated for seven months until their property was habitable. Other properties in Ryder Close had similar flooding problems. Bovingdon is on a clay hill – drainage at the end of Green Lane is a constant concern after even the slightest amount of rainfall.

Driving out of Nye Way or Orchard Way is already dangerous. There are vehicles regularly parked virtually all the way down one side of Green Lane. This makes it very difficult to see oncoming traffic in either direction. It is also a school bus and public bus route and the road is barely wide enough to accommodate a bus and a parked car. At the junction of Green Lane and High

	<p>Street (Ryder Memorial) my car had its rear bumper ripped off by a bus – the insurance investigation resulted in the bus being found at fault. A bus cannot fit in the lane space that is currently provided. The proposed Bov-h3 which suggests “no right turn” access from Green Lane at Louise Walk and Homefield using a sign from Louise Walk to <i>encourage</i> access from Chesham Road down Green lane insufficiently addresses or recognizes the increased volume of traffic and is not a good enough solution.</p> <p>Without infrastructure improvements, any development in Bovingdon beyond the 90 in the existing plan is not sustainable and will negatively impact the quality of life in Bovingdon even further.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12137
<b>Full Name</b>	FRANCES COX
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>If the government is insisting on housing quotas to be met, then they must seriously consider bringing in compulsory purchase and use the Bovingdon Airfield? Contrary to the directive to develop brownfield sites first it seems that Bovingdon Airfield has not been considered despite a very successful redevelopment of Leavesden Airfield.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12160
<b>Full Name</b>	Mr howard button
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>HH-h3 Shendish Manor: Development of this area would result in the merging of Kings Langley into Apsley and Hemel, making Kings Langley in effect a suburb of Hemel. This would change the character of Kings Langley with real loss of identity valued by the residents of the “Village”.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO12164
<b>Full Name</b>	Mr howard button
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	KL-h1 Hill Farm: Additional houses so close to Kings Langley schools could result in many existing Kings Langley residents not being able to attend school in their village, we are already suffering serious traffic issues in the main route towards Hill farm namely Vicarage Lane and this road just cannot cope with any additional traffic.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12169
<b>Full Name</b>	Mr howard button
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	KL-h2 Rectory Farm: I would support some low-density housing development on the brownfield area of Rectory Farm with an area of land passed over to more sustainable use by village interest groups such as Transition in Kings ensuring valuable farm land is retained for local produce growth.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12172
<b>Full Name</b>	Mr howard button
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	KL-h3 Wayside Farm: the development of Wayside Farm is totally unacceptable and should be thrown out, Kings Langley does not need it and does not want it. The farm

	is a valued part of the community and building on this would negatively impact on the community and feel of the village as many people regularly visit the farm and walk in the surrounding countryside.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12181
<b>Full Name</b>	Ray Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p>Standard BRAG response to Question 46. Please note full document is attached to Q46.</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but</p>

the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/05/BRAG-Analysis-of-Green-Belt-Review-for-Hemel-Dacorum-2016-17.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canal side environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.



### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the

outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the

grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs –

unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at

- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries

- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major



concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns

of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site

- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12186
<b>Full Name</b>	Ms Julie Hollway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Berkhamsted is "full". The town has already been significantly impacted:</p> <ul style="list-style-type: none"> <li>- car parking is constantly a serious concern</li> <li>- traffic is usually standstill in the high street and at key junctions (especially end of Shootersway, Durrants Lane/High Street, Darrs Lane/High Street)</li> <li>- medical/health facilities are known to be insufficient for the existing population of the town - Health Service won't be funding more clinics even if developers propose to put forward some small % of funding needed.</li> <li>- school spaces are pretty much at maximum, with secondary schools being totally full and already almost the largest in the county. Secondary schools cannot cope with any further places for additional housing - CCG won't be funding more schools even if developers propose to put forward some small % of funding needed.</li> <li>- water pressure and waste is known to be a problem across the town</li> <li>- there are already not enough public open spaces, removing green belt land, whilst not public open space, does provide a sense of space and country</li> <li>- trains into Euston are already full with standing room only each morning - Network Rail will not be adding more trains to accommodate growth in homes in Berkhamsted</li> <li>- regardless of a move to increase walking and cycling options in the area, residents will not use them due to the steep slopes on the side of the valley. No-one will carry their weekly shopping back from the town up the hill! Thus new residents would use more cars, impact the already dyer traffic situation and contribute more pollution to what should remain a country town.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12187
<b>Full Name</b>	Ms Julie Hollway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>Specifically the proposed site (Ref Be-h4) "Land between Durrants Lane / Darrs Lane / Bell Lane" is especially concerning and I whole-heartedly contest is proposal:</p> <ul style="list-style-type: none"> <li>- our Green Belt is precious and makes Berkhamsted the country town we would all like it to remain. We need to keep the open spaces we have!</li> <li>- this site is adjacent to the Chiltern AONB and is also affected by archaeology (Grim's Ditch)</li> <li>- the land to the south and opposite Bell Lane has sink holes already</li> <li>- there is no mains drainage in the area</li> <li>- there is no mains gas supply in the area</li> <li>- the site has a steep slope and provides valley views from the other side maintaining the rural nature of the edge of the town</li> <li>- access roads are either already heavily congested (Shootersway &amp; Durrants Lane - especially after the recent addition of 100 houses in a new development on the road) or dangerous with inadequate junction space, bends and parked cars (Darrs Lane, Bell Lane and Durrants Lane). Bell Lane specifically has soft verges, is rural in nature and home to many wild birds and animals.</li> <li>- it is considered too far to walk or cycle into town and back up the hill with shopping. There are no bus routes and I doubt the suppliers of the bus service will fund additional routes.</li> <li>- the promoter is only suggesting "potential" contribution for primary and secondary schooling, clinic, road improvements, bus service, open spaces. No-one is going to fund the remainder (CCG, Health Service, bus services, council, etc are already strapped themselves) and we would be left with a development without appropriate infrastructure and yet more terrible traffic and reduced open spaces!</li> <li>- this is not safe or sensible land to develop on.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12188
<b>Full Name</b>	Ms Julie Hollway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am concerned other sites in the Shootersway area are being considered too, eg "Land adjacent to Blegberry Gardens", "Haslam Fields" and the "Golf Driving Range", as the infrastructure is just not available in the area to support these. Even with the addition of new traffic lights at end of Shootersway and bottom of Durrants Lane after the additional 100 homes built on Shootersway this year, the road system cannot cope and each morning and evening traffic backs up even further with significant delays. With existing houses lining the current small</p>

	roads in the south west part of Berkhamsted, there is no means of significantly improving the road system without removing existing and established homes.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12190
<b>Full Name</b>	Ms Julie Hollway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>According to the existing plan, we do still need to provide further homes in Berkhamsted anyway, ie without the additional ones in the Single Local Plan to 2016 Options. I believe, of the potential sites in Berkhamsted, the best one is the area previously considered for development and known as the "South Berkhamsted area". This is preferable as I can see how the area could be developed to deliver the critical infrastructure and proposed link road access and is near the A41 for access.</p> <p>Berkhamsted probably doesn't need more large houses but rather smaller accommodation and maximising the use of land alongside essential services such as schools, clinics, shops, bus services, etc.</p> <p>However the site would still have to be sensitively developed to maintain the rural nature and appearance of Berkhamsted (eg initial view and perception of the town to residents and visitors arriving from the A41) and, as a community, maintaining the culture akin to Berkhamsted living.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12192
<b>Full Name</b>	Karrina Mawson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I feel Tring is severely constrained in terms of the growth it could accommodate, our existing infrastructure needs have not been met. Infrastructure needs are not your domain but because those that are responsible for our infrastructure needs have not achieved success in this matter, it is irresponsible to continue housing growth under these current circumstances when you know nothing was done in the past and will not be done in the</p>

	<p>future as no plans to grow infrastructure have been made to solve our current crisis. I do not want you to make a decision that will have add a negative effect to our current poor infrastructure.</p> <p>Tring has already contributed to the targeted growth in current housing over the last 5 years and the contributions towards the targeted growth of already authorised planned housing in Tring's area. Hemel has not achieved the same growth.</p> <p>Tring is very close to the Bucks border. The three villages of Tring, Aston Clinton and Halton all intermingle. They use our schools and shops etc. The planned developments in Aston Clinton and Halton will add to Tring's burden on schools and infrastructure. Although the Bucks development is not within your control. You should include its effects in your decision. You should include the impact of the huge Bucks developments on Tring.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LP1012238
<b>Full Name</b>	Douglas & Christina Billington
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present</p>



and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-Green-Belt-Review-11-10-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000>) for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you

rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be

- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from

- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway

station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the

- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of



Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities

- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of

commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
  
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision

- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
- Encroachment of the urban area along the valley bottom and into adjoining open

- Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

	<ul style="list-style-type: none"> <li>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12240
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>TR-h1</u></b></p> <p>The site at Station Road should remain in Green Belt, otherwise this will be a significant loss of Green Belt. The impact on the adjoining CAONB of any development would make it unsuitable. The proximity of the canal must also be considered, as it is a wildlife site and key green infrastructure. The site is close to the Chilterns Beechwoods SAC.</p> <p>Station Road is too far from the town of Tring for services and employment.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12241
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society

<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>Tr-h2</u> Land west of Marshcroft Lane should remain in Green Belt. The same arguments as for Tr-h1 pertain. It is too far from the town centre. Marshcroft Lane is a very narrow country lane, and unsuitable for significant traffic.</p> <p>[Comments for TR-H1: The site at Station Road should remain in Green Belt, otherwise this will be a significant loss of Green Belt. The impact on the adjoining CAONB of any development would make it unsuitable. The proximity of the canal must also be considered, as it is a wildlife site and key green infrastructure. The site is close to the Chilterns Beechwoods SAC.]</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12242
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>Tr-h3</u> The site known as Grove Fields is unsuitable for development as it is bordered by land with Article 4 Direction and has special views towards Ivinghoe Beacon. It is also bordered by CAONB on the other side of Bulbourne Road. This should remain in the Green Belt. Any future housing development would be seen from these specially designated areas.</p> <p>This site is also too far from the town, and is lacking in infrastructure.</p> <p><u>Increased housing should be avoided on this side of Tring which will become too close to a much- expanded Aylesbury</u></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12243
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society



<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Tr-h4</u> Development at Cow Lane/Station Road should be avoided as it is Green Belt and CAONB. It is also too far from the town, and is identified more with the surrounding countryside
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12244
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Tr-h5</u> The site at Dunsley is the best option, and it is on a bus route. And more importantly it is the only site which is very near the town centre and within walking distance, whereas all the other sites significantly increase car dependency – with parking and major traffic problems. Dunsley Bungalow and orchard should be excluded from development.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12245
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Berkhamsted is already subject to substantial development. It is a historic town situated in a steep valley with CAONB around part of it and it is largely within Green Belt. The pressure on infrastructure is severe, the road network is often difficult to move around and parking in the town centre and at the station in particular. In terms of health, the town is a long way from A & E facilities either at Watford or Stoke Mandeville,

	actually it is the worst situated in Dacorum for this, and the doctors' surgeries in the town are under pressure. Schooling has recently been restructured to try and meet existing need, but some children need to travel to Hemel Hempstead. The bus services are limited and in the main serve only the road along the bottom of the valley
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12246
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	3 of the sites (h4, h5.h6) were not recommended in the earlier Stage 2 Green Belt Study, and h8 is not recommended for further consideration in this appraisal.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12247
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Be h1 land south of Berkhamsted</u> Due to the size of the total of plots (970) units this effectively would create a new "village" and would require its own facilities as it is some distance from the main town
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12248
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>BE h2 Haslam Fields, Shootersway</u> This proposal for 80-100 units would mean loss of greenfield land and school playing field although owned by the Berkhamsted Schools Group who propose retaining a portion as open land, this should be made a condition. Transport links should be provided as it is on a steep slope making walking and cycling into main facilities difficult.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12249
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Be h3 land at Ivy House Lane</u> This is adjacent to the CAONB and whilst mitigation is suggested, the form this will take needs careful consideration before proceeding.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12250
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Be h4 land between Durrants/Bell/Darrs Lanes</u> This site was not identified for further assessment in Stage 2 Green Belt Review, so there needs to be compelling case for a change to provide approx. 200 houses. Bell Lane and Darrs Lane, and to a lesser extent, Durrants Lane are rural roads with gradients, bends and single lane traffic on parts of Bell Lane and significant highway works would be required to support what is already a crowded network, and the resultant strain onto a busy Northchurch High Street
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO12251
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Be h5 Lockfield, New Road, Northchurch</u> This site was not identified for further assessment in earlier study. The impact on the Grand Union Canal and the adjoining CAONB should be carefully mitigated and there would have to be access improvement for traffic movements onto New Road.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12252
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Be h6 Blegberry Gardens, Shootersway</u> This site was not identified for further assessment in earlier study, it is near other Shootersway development and there are architectural issues. As 105 houses are proposed there should be a demonstrable need for this development.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12253
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Be h7 Land at Bank Mill Lane</u> Flood plain on part, no other comments

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12254
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	This lies in the CAONB and has not been recommended in current assessment, the proposal for Care Home. This is far from the town centre and better access would need to be provided
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12255
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Green Belt and Landscape Conservation Area</p> <p>Land rises steeply from Leighton Buzzard Road (A4146)</p> <p>This area was excluded from assessment and retained as Green Belt in the Council's Green Belt Review as it was considered to be of high landscape sensitivity.</p> <p>HH-h1a adjoins the small settlement of Piccotts End which is a Conservation Area with high Archaeological and Heritage Significance. This settlement will be consumed by the major development which is unacceptable given its historic importance.</p> <p>The site is on the edge of Hemel Hempstead and therefore will increase the visual damage to the area as the site is visible from long and short distances, especially from the other side of the valley which is also Green Belt and a Landscape Conservation Area. It will severely damage Ancient Woodland and as the ecological assessment has not been undertaken this site's inclusion is premature.</p>

A large portion of HH-h1b lies within St Albans and therefore will not add to Dacorum's housing stock although the majority of its impact will be felt by Dacorum. There must be cooperation from St Albans over this area.

Major infrastructure is proposed which will further urbanise this very sensitive location on the urban edge including a new road through the entire site from Leighton Buzzard Road. This road at present only has minor road junctions which have limited impact on the environment. A new major road would severely impact on the environment given the need for lighting and signage.

The offer of a parkland buffer is visually and ecologically inappropriate as the area is currently open farmland and woodland.

This is a very sensitive area as an open attractive, undeveloped gateway into the urban area. The Council in its Adopted Core Strategy states that the key role of the countryside on the edge of Hemel Hempstead is to maintain the physical separation from smaller villages and hamlets on its periphery and to maintain the Gade valley which provides a strong landscape setting for the town (para.8.24). Clearly development will severely affect this, eroding the landscape setting and reducing the separation between Piccotts End and Hemel Hempstead. On the northern end of this proposal, the separation between Hemel Hempstead and St. Albans will be considerably reduced.

Conclusion: This proposal is contrary to one of the purposes of the Green Belt which is to stop the coalescence of towns and villages. This site will consume Piccotts End in the south and reduce the separation of Hemel Hempstead and St Albans in the north. It lies within the most visually and ecologically important edge to Hemel Hempstead and any major development will result in severe damage to the whole area. There should be no development near or around Piccotts End and no new access from Leighton Buzzard Road. The ancient woodland must be protected

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12256
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p><u>HH-h2 North of Gadebridge (Land at Piccotts End)</u> Green Belt and Landscape Conservation Area</p> <p>Land rises steeply from Leighton Buzzard Road (A4146). This is a very sensitive area as an open attractive, undeveloped gateway into the urban area.</p> <p>The site is on the edge of Hemel Hempstead and therefore will increase the visual damage to the area as the site is visible from long and short distances, especially from the other side of the valley which is also Green Belt and a Landscape Conservation Area.</p> <p>This is a very sensitive area as an open attractive, undeveloped gateway into the urban area. The Council in its Adopted Core Strategy states that the key role of the countryside on the edge of Hemel Hempstead is to maintain the physical separation from smaller villages and hamlets on its periphery and to maintain the Gade valley which provides a strong landscape setting for the town (para.8.24). Clearly development will severely affect this, eroding the landscape setting and reducing the separation of Piccotts End and the village of Potten End.</p> <p>Conclusion: this site lies within this sensitive visually and ecologically important edge to Hemel Hempstead and any major development will result in severe damage to the whole area. Object</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12257
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Green Belt and Landscape Development Area. This is a major southward expansion of Hemel Hempstead along the Gade valley into open countryside. There is extensive tree coverage. It 'wraps around' Shendish Manor (a listed building) which is in a parkland setting (a locally Registered Garden of Historic Interest). It is of high landscape sensitivity and importance to the southern part of Hemel Hempstead.</p> <p>The land rises steeply from London Road (A4251), and will 'fill-in' the gap between Rucklers Lane and the mixed development of Apsley. It will also effectively join the 'settlement' of Nash Mills. The loss of open countryside</p>

	<p>and the possible reduction in size of the golf course is unacceptable. The tree coverage, which must be retained, further limits the extent of development.</p> <p>Access in this area is limited with London Road through Apsley suffering severe congestion at most times.</p> <p>Conclusion: Some limited development maybe acceptable but the setting of the listed buildings must be protected and the extensive tree coverage must be retained. Development should not extend along London Road and the severe access problems must be addressed.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12258
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>HH-e1 Land east of A41 at Felden</u></p> <p>This is building on open countryside separated from the main area of Hemel Hempstead by the main line railway and the A41 slip road. Access is difficult. It lies close to Roughdown Common SSSI and wildlife site which would be severely damaged by development. The Council has not recommended further assessment for a Green Belt boundary review.</p> <p>Conclusion: Object</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12259
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>BOVINGDON (Large Village)</u></p> <p><u>Bov-h1 Land at Grange Farm</u></p>



	<p>This involves the southward expansion of the large village of Bovington into open countryside. It is some way from facilities in the village core which are already under strain from recent development. There are defined road boundaries to limit further development.</p> <p>Any development must improve village facilities including school and health facilities which are already under strain. The High Street suffers severe congestion and measure should be imposed to alleviate this.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12260
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>Bov-h2 Land south east of Homefield</u>  This is bordered on two sides by housing development although open countryside lies to the east and south. Landscaping must provide a soft edge to the settlement.</p> <p>Any development must improve village facilities including education and health facilities which are already under strain. The High Street suffers severe congestion and measures should be imposed to alleviate this.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12261
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>Bov-h3 Land r/o Green Lane/Louise Walk</u>  This lies south of proposed site Bov-h3 which would provide a considerable expansion of the village to the south east. Part of the site extends beyond the south eastern boundary of Bov-h2 which is an incursion into open countryside. This part of the site is unacceptable and should be retained as open countryside.</p>

	Any development must improve village facilities including schools and health facilities. The High Street suffers severe congestion and measures should be imposed to alleviate this.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12262
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>Bov-h4 Land at Duckhall Farm, Newhouse Road</u> This fills in the gap between houses in Hempstead Road and the Mount Prison. Its location is close to the village core although any development must include improvement to village facilities including schools and health facilities. The High Street suffers severe congestion and measures should be imposed to alleviate this.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12263
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<u>KI-H1 Land at Hill Farm, Love Lane</u> This results in a northward expansion of the Large Village of Kings Langley and proposes high density housing. It is adjacent to a conservation area and Listed Buildings and access maybe a problem as it is off a relatively narrow road which also serves a large secondary school. The site extends to the A41 bypass and provision for a soft buffer to the open land to the north. It is a considerable way from the village services and facilities which will need to be assessed for capacity
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO12264
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>KL-h2 Land at Rectory Farm, Hempstead Road</u></p> <p>This site involves the northern extension of the village and is bordered by the Grand Union Canal and Hempstead Road. Part of the site is already developed for commercial purposes so its redevelopment offers the opportunity to enhance the area especially along the canal frontage. It is also a flood area which will need to be assessed. It is close to the main facilities of the village but their capacity will need to be considered. It also is eroding the buffer between the village and Hemel Hempstead which is contrary to Green Belt objectives</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12265
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>KL-h3 Land to the east of A41 and Wayside Farm, Watford Road</u></p> <p>This is a sizeable site of 60ha and its development would considerably change the character of the area and of this large village. Stage 2 Green Belt Review excluded it from further assessment. It would extend built development from the village along the Watford Road (A4251) to the junction of M25/A41 and up the valley side to A41. This would result in excessive loss of Green Belt, totally change the character of the village and materially affect the Gade valley. Mixed development is proposed which may be acceptable near the railway station but development on this scale will need further detailed assessment. It would lead to a very small gap between Kings Langley and Watford – contrary to the purpose of the Green Belt to it becoming a suburb of Watford (para.8.24 of the Dacorum Adopted Core Strategy.)</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO12266
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	***The cumulative effect of all the developments proposed at Kings Langley results in the loss of nearly 80ha of Green Belt land and totally change the character and appearance of the village and the area as a whole and totally consume the currently modest size of the village.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12267
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b><u>My-h1 Land south of Markyate</u></b> This site is at the edge of the village close to the A5. It will have an impact on River Ver but it may present an opportunity to improve its environs. Part of it is within a flood plain but it could provide development on a smaller scale.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12268
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b><u>My-h2 Land at Pickford Road</u></b> This lies within the Rural area and adjacent to CAONB and a Wildlife Site which would be severely affected. It

	is at the southern entry to Markyate. It extends development into open countryside and is at a distance from the facilities of the village and is on the top of a steep hill, making walking/cycling to the village centre difficult. The site is unacceptable on these grounds.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12269
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>O-h1 Land at Old Kiln Meadow, Water End Road, Potten End</u></b></p> <p>This site is put forward purely speculatively as in the small villages within the Green Belt only development providing for local need is acceptable. No local need assessment has been carried out therefore it is premature to include this. The proposal for up to 49 dwellings is far in excess of local <u>need</u> in this village. It extends the village long Water End Road into open countryside and would need to provide a soft edge to the open land. There has not been a study on the capacity of local services/facilities including the small village school and the village has very limited bus service.</p> <p><b><u>Object</u></b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12270
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>O-h2 Land to the north east of Grange Road, Wilstone</u></b></p> <p>This is a village in the rural area and the site is located on the edge of the village extending into open countryside. No local housing need assessment has been undertaken and this is not a small expansion as stated (up to 42 units). The village has limited facilities and poor links to larger centres. Object</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12271
<b>Full Name</b>	Colin Blundel
<b>Company / Organisation</b>	Chiltern Society
<b>Position</b>	Planning Officer
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>Tr-h6</u>  Site along Icknield Way, known as Canal Fields must remain Green Belt. Any development would create a precedent of development along this special scenic stretch of countryside in the Aylesbury direction. This site is immediately adjacent to CAONB. There must be a boundary between Tring and much-expanded Aylesbury.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12317
<b>Full Name</b>	Richard Frankel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p>

Standard BRAG response to Question 46. Please note full document is attached to Question 46.

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

This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-SM-Facsimile.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**



- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt

- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative

impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'

- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking

trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage

- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.



- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB
    - Suggestion of potential new primary school – not part of Berkhamsted education policy
    - Lack of secondary school capacity – Ashlyns School
    - Same arguments on accessible housing – distance from facilities and services
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see

a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the

- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open

- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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to the town centre and further afield are good but usage, for any purpose, remains

- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's

	<p>traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</p> <ul style="list-style-type: none"> <li>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12322
<b>Full Name</b>	ms rona morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Site Be-h3 Land at Ivy House Lane.</p> <p>See uploaded file, no apologies for uploading BRAG points but they seen spot on.</p>
<b>Include files</b>	<a href="#">Ivy House Lane Bullet Points</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12386
<b>Full Name</b>	Mr Brian Kazer
<b>Company / Organisation</b>	Tring in Transition
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>Yes.</b> Tr-h4 is in the Chilterns AONB. Being at the junction of Station Road and Cow Lane, those roads already

	<p>provide a hard edge to the Green Belt. This proposed site creates a soft edge. Given our reply on question 44, there is in our view no justification for development on this site.</p> <p>[Response to Q44: Option 2C is our preferred option, although the allocation to Tring, based on projected population growth of 22.9%, should be amended to 620 in Green Belt + 500 in its urban area.]</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12387
<b>Full Name</b>	Mr Brian Kazer
<b>Company / Organisation</b>	Tring in Transition
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Opportunity at two Tring existing sites for sheltered housing and additional residential home. First is north of Western Road (this site being very short walk to Tring's health centre, a pharmacy, and some local shops), and Akeman Street (short walk to post office, and small supermarket etc).</p> <p>In Tring, Tr-h5 should be developed first to comply with NPPF requirement of presumption in favour of sustainable development. The other Tring proposed sites will significantly increase car dependency as compared with Tr-h5 as they are significantly further from the town centre, and too far for walking to be a realistic option.</p> <p>Tr-h6 was assessed by the Arup Report "Green Belt Review and Landscape Appraisal Stage 2 January 2016" as <i>"it is also almost completely constrained by AONB and has a number of other non-absolute constraints which, although don't preclude development, make it less preferential. Exclude from further assessment and retain as Green Belt"</i>. We would thus recommend Tr-h6 be removed from this Local Plan.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12409
<b>Full Name</b>	ms rona morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>1) <u>Be-h3 Land at Ivy House Lane</u></p> <p>My core objections to the inclusion of this site in the Issues and Options Paper are recorded in an email of today's date submitted to you by Mr Bruce Morris [REDACTED], Berkhamsted as coordinator on behalf of the residents situated along the north side of this site. In addition the following comments also strongly support the need for this site to be rejected quickly.</p> <p>1.1. Not only is this site bounded on the easterly edge by AONB but in a northerly direction it is bounded by green belt or other properties that flow directly into common land/AONB. Maintaining this field is important to protect the beauty of this dry valley. Given the topography of the site any attempts at screening will be futile.</p> <p>1.2 To develop this site will endanger the habitat and lives of a wide array of wildlife that find sanctuary on the southerly side of the Potten End to Berkhamsted road.</p> <p>1.3 The suggestion that this site meets sustainability criteria of walking and cycling is nonsense given the steepness of the valley. Any footpaths will always be width constrained at certain points putting the users too close to traffic. Extracts from Hertfordshire County Council's 2013 Bikeability Audit report record: "Cycling on Gravel Path is dangerous, especially on the ascent and becomes a Level 3+ due to its steep ascent and subsequent slow speed of cyclists on the narrow carriageway ... Gravel Path represents a major barrier to cycling. The steep inclines together with the speeds of vehicles, alongside narrow carriageway widths across the railway bridge make it difficult and uncomfortable to navigate as a cyclist. " "In certain locations (Gravel Path.....) gradients are such that the implementation of specific cycle measures would provide futile". Ivy House Lane would present similar challenges for cyclists.</p> <p>1.4 Any proposal to use Ivy House Lane as access for a residential development of up to 150 houses underlines the pure commercial motive behind the developers putting this forward and highlights the flaws in the process of including this site as an option. The process should allow for certain sites that are clearly inappropriate to be screened out prior to public consultation. Ivy House Lane is clearly incapable of safely providing access. To progress with that as a route knowing the associated issues must call into question whether appropriate regard has been paid to the safety of the residents of that site should it go ahead and to other users of Ivy House Lane. The increased traffic on Gravel Path would increase the safety issues already associated with that road.</p> <p>1.5 This site has already wasted a huge amount of tax payers money given the number of times it has come up for review. It is now time to bring this to an end by designating it as ANOB and focus our limited resources on sites worthy of deliberation.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12410
<b>Full Name</b>	ms rona morris
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>2) Proposed increased house building in Berkhamsted.</u></p> <p>2.1 Berkhamsted has already increased significantly in size since I moved here over 22 years ago. Much of the development has been focussed very appropriately on brownfield sites within the urban area. As a result, Berkhamsted is now full. Yes there may well be room in the current environment to continue maximising opportunities for smaller brownfield developments however the supportive infrastructure cannot cope with numbers beyond that.</p> <p>2.2 Anyone who lives in Berkhamsted is aware of the difficulties we are now facing.</p> <p>The market town roads can't cope with current traffic. Our GP services are already under significant pressure. And access to specialised and emergency support is currently a life threatening long journey away in the heart of busy Watford which is even worse on match day with football traffic.</p> <p>Berkhamsted struggles today to be able to supply the basic provision of tap water to its residents throughout the year. Having suffered several outages this year during hot weather (some of which lasted up to 8 hours) it is clear that our water infrastructure can not meet the demands of our current population far less significantly increased numbers. At those times it feels like living in a 3rd world country. I doubt if we lived in inner London such outages would have gone without bottled water being provided and accompanying negative media coverage.</p> <p>Future development of Berkhamsted should be consistent with the Core Strategy adopted as recently as September 2013. The house building rates and the Green Belt releases around the market towns that are suggested in some options in the Issues and Options Consultation are a significant departure from existing policies in the Core Strategy.</p> <p>The reality is that Berkhamsted has already been the "good citizen" and is ahead of its housebuilding target by 34%. Yet Hemel Hempstead the "New Town" which should be an ideal candidate for expansion is the laggard</p>



	of the pack being 21% <u>below</u> target. One must question why that is? Lack of competence by those responsible for Hemel Hempstead housebuilding? Or financial gaming by knowing that more money is received for houses built in Berkhamsted? Such disparities in current housebuilding progress within Dacorum must be taken into account when assessing development numbers and site options going forward.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12461
<b>Full Name</b>	Judy Halden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p>Standard BRAG response to Question 46. Please note full document is attached to Question 46.</p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p>

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Argts-to-Green-Belt-Review-of-the-DBC-SM-Plan.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean

quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types

and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection

had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution



- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision

- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer

months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
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- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community

- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area

- Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12509
<b>Full Name</b>	Meenakshi Jefferys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p>



In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/03/BRAG-Analysis-of-the-Green-Belt-Review-for-the-Dacorum-SM-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000>) for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This

approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present

Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the

hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or

business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town

- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents



would walk to and from the town on any pathway provided highly unlikely

- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such

as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance

- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance

- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment

- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12556
<b>Full Name</b>	Mrs Jane Barrett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p>Standard BRAG response for Question 46. Please note full document is attached to Question 46.</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit</p>

to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/05/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-St-Alban-s-MFAS-imp.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and

quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of

the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not

sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems.

The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions

- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes,



blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top

- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
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- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt

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- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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	are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12606
<b>Full Name</b>	mr paul healy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly"</p>

the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/05/BRAG-Analysis-of-Green-Belt-Review-for-Hemel-Dacorum-SM-Phase-1.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.



### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the

outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the

grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs –

unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at

- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries

- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major



concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the

- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the

- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns

of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site

- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
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ID	LPIO12608
Full Name	Mr Stuart Findlow
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing to inform you that I am vehemently opposed to the development of the site reference <b>Tr-h5 Lane at Dunsley Farm Tring</b>, which incidentally has been turned down in the past because of its lack of suitability.</p> <p>This land is designated Green Belt and it is bordered by the Chilterns Area of Outstanding beauty. It is essential that the setting of AONB should be preserved and not damaged. It is also a green corridor into the town and it is part of the established character of Tring. If this land is developed it will destroy the largest and main green gateway to Tring. People entering Tring via this route are greeted with wonderful views displaying lush green undulating open fields, beautiful trees, plants, orchard land and farms. It is sights which give Tring its sense of identity, namely that of a small unspoilt rural farming town.</p> <p>Developing this land will result in the loss of two farms which have been worked for many generations by the same families. The dairy herds are very productive and serve an extremely useful purpose, especially at a time when government directives encourage the country to be more self-sufficient with production of food. It would be a crime to displace farmers and their workers who labour hard and take such pride in their essential occupations.</p> <p>This site contains valuable wildlife and wild plants that will be destroyed and not replaced, thus eradicating more of our countryside heritage.</p> <p>There are no plans for an infrastructure such as new car parks and schools. This would place too high a demand on the services that Tring has on offer, or would be able to provide. Doctors' surgeries are unable to cope with the current demand with waiting times of two weeks. Even if the range and depth of services were increased it would be at a further cost and it would change the charm of Tring. Lost forever would be Tring's quaintness and the impact of its historical buildings and shops in a confined area. Furthermore, there would be increased traffic pollution and congestion.</p> <p>Tring has a petrol station, a Tesco and a Marks and Spencer supermarket. It certainly does not need any more of these type of buildings.</p> <p>Recent police force cuts have meant slower response times to local crime and this will put more pressure on this over-stretched service. There would probably be an</p>

	<p>escalation in trouble with bored children and young adults roaming the streets.</p> <p>It does not make sense to put industrial units and warehouses on this site when there are more suitable areas already containing warehouses at the other end of town with easier access to the bypass.</p> <p>This is not wise for a number of reasons. Firstly, the water rolls down the Chiltern Hills and creates flood plains at certain times of the year. This problem is compounded by the fact that the proposed building land is not flat. In fact, special drainage is placed on property in Dorian Close in order to prevent flood damage occurring to buildings there. Also, Damask Close and Station Road have had problems with flooding in recent years, despite the provision of storm drains being built there. Secondly, the noise from traffic on the London Road and the bypass is extremely loud. Furthermore, there is also additional noise from the aircraft travelling overhead on their flight paths to and from Heathrow and possibly Luton. Special provision would increase tremendously.</p> <p>Many people have worked hard all their lives in order to obtain substantial property which backs onto site Tr-h5. Building on the fields will ruin residents' view of a picturesque landscape and diminish their sighting of wildlife. Valuable footpaths will be lost for walkers. It will also mean that residents will suffer from extra light pollution and noise pollution and possibly increased crime. Furthermore, it will devalue their property substantially. Current nearby residents would be unable to move even if they wanted to.</p> <p>If site reference Tr-h5 land at Dunsley Farm Tring is chosen, more drivers will choose to bypass the area near Tesco and instead use Cow Lane as a short cut to avoid congestion. Cow Lane is a dangerous, badly maintained, narrow lane with an uneven camber and an unrestricted speed limit in places. At weekends this road is still busy and hazardous. This is because adults and children attend rugby, football, squash or bowls at the clubs along this road. There is inadequate parking and this results in cars parking on the bend of the road and on grass verges. Cow Lane will not be able to safely cope with an increase in traffic.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12656
<b>Full Name</b>	Merrick Marshall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation.

To avoid repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.

However, I would like to take this opportunity emphasise just a few of the most important points within that response.

Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-Header-DEC-by-SM-Facing-1.pdf>) for a full analysis of stage 1). In short, both of the DBC commissioned papers provide textbook examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet

the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**



- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its

attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult

- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that

bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest

this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre

on other side of A41 – increasing car journeys even more

- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
  
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway

bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the



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- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of ‘bus loop’ therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling

etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA

- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage

	<ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12704
<b>Full Name</b>	Monika & Casper Gibilaro
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under our name.</b>

Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-SM-Review.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main

routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canal side environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.



## Comments on individual sites

### Be-h1 Land south of Berkhamsted

#### Core Strategy rejected this option for the following reasons

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive

- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services

to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility

- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was

very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but

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- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB



- Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident

- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision

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<b>Number</b>	Question 46
<b>ID</b>	LPIO12753
<b>Full Name</b>	Lorna Ginn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Here are my comments on the new Local Plan</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the</p>

fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. **Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development. The site at Bank Mill would mean building on a flood plain and on green belt land.**

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-S14-Main-Report.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main

routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canal side environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

## Comments on individual sites

### Be-h1 Land south of Berkhamsted

#### Core Strategy rejected this option for the following reasons

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place



- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive

- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services

to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility

- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was

very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but

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- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB

- Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident



- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision

	<ul style="list-style-type: none"> <li>• facilities and services not accessible</li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12755
<b>Full Name</b>	Mr Raymond Phipps
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I wish to comment as follows to the Strategic Options Consultations. In general I follow the comments made by BRAG.</b></p> <p>I do not believe it is possible and certainly not desirable to load more housing into the Berkhamsted. My reasons are:</p> <ol style="list-style-type: none"> <li>1 The town cannot take more traffic. It is already overloaded.</li> <li>2 The other infrastructure is similarly overloaded. Water supplies, electricity supply especially to the South of the town.</li> </ol>

- 3 Lack of school places, inadequate medical services, inadequate provision for an elderly population.
- 4 There appears to be no or insufficient provision anywhere in the proposals for Social housing. Many of our younger and less well paid members of the community cannot afford so called "Affordable Housing" as important as this is. Developers must not be allowed to avoid their responsibilities and the Council/ Housing Associations must build more rentable accommodation. This element should form part of the new Plan.

5. Green belt must be protected and only yielded for housing at the very last resort. It is part of our heritage and belongs to future generations also.

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NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(http://www.stalbans.gov.uk/24072/Local-Plan-Review-FAQ.html)~~  
 a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet

the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its

attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult

- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251



- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that

bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest

this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider countryside
- New building could set a precedent for further development of land southwards to the A41
- Site is too small to offer scope for additional town-wide leisure space.

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre

on other side of A41 – increasing car journeys even more

- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
  
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway

bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges.
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative,

walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and station.
  
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of ‘bus loop’ therefore not viable solution. Berkhamsted bus routes have

decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the canal

- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets"

such as the Grand Union Canal and the River Bulbourne”

- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the A41

- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was



very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility

	<ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12801
<b>Full Name</b>	R Woollon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	As someone who has lived in Bovington for 46 years it is perfection obvious to me that our infrastructure is at,

	<p>or has already reached in some cases, BREAKING POINT:-</p> <ul style="list-style-type: none"> <li>• Traffic congestion and lack of parking chaotic.</li> <li>• Our primary school is full and second schools oversubscribed meaning that children have to travel ever further to schools that they hadn't even chosen.</li> <li>• Sewerage and drainage are and have been inadequate for years – I live in Church Street and whenever it rains we have floods and sewage pours onto the road adjacent to the pumping station here.</li> <li>• Many people who live in the area obviously work in London and by 8.30 am the station car parks at Hemel, Kings Langley, Berkhamsted, Chorleywood and Chalfont are packed. This results in people parking on the pavements locally.</li> <li>• P. Surgeries are also oversubscribed and with the coming of RETIREMENT homes in Bovington and Kings Langley will only suffer more. I will not even mention the HOSPITAL situation!!!!</li> </ul> <p>I find it “mind blowing” that four owners/developers in Bovington should have their offering of land for development (all in the GREEN BELT) even be put up for consideration by the Council given the infrastructure problems and feelings on Green Belt.</p> <p>If any of these sites were <u>ever</u> to be considered in the distant future, the owners should be given the relevant agricultural land value, as that is what the fields are worth, and the money saved could then be invested in infrastructure changes.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12848
<b>Full Name</b>	Ingrid Carola McKenna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>In addition, I draw attention to some of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or</p>

the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-SM-Process.pdf>) for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is

clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

## Be-h1 Land south of Berkhamsted

### Core Strategy rejected this option for the following reasons

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.

- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'



- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land

- Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep

gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used

heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane

- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic.A

large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB
    - Suggestion of potential new primary school – not part of Berkhamsted education policy

- Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway

- Distance from town centre services and vital facilities
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible

	<ul style="list-style-type: none"> <li>Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12896
<b>Full Name</b>	Mr Stephen Lally
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Rather than repeat the BRAG response, with which I completely agree, I will highlight some key points that are important to me.</b></p> <p>. <u>Access</u>. Berkhamsted is an ancient linear town in a steep valley. Access to the town centre and station can only be down steep, narrow streets with much necessary on-street parking. There is very bad access to the town centre from the largest proposed sites.</p> <p>. <u>Congestion</u>. Berkhamsted town centre roads are already frequently crammed with nose to tail queues of cars pouring out exhaust fumes. It cannot get any worse so what will happen if too many news homes are built, as under your plan.</p>

. Infrastructure. Facilities such as schools, doctors, sewerage are already overflowing, to bursting point. What little improvements that have recently been made to this infrastructure have not kept up with recent town growth and I have no confidence that services will improve sufficiently for the extra houses you propose.

. Green belt. Building up to 900 new homes on green belt land is unacceptable. These sites are highly visible hilltop sites and are regularly used by me and others for recreation. Green belt cannot be continuously moved back and re-sited further out from a town like Berkhamsted. This destroys the whole purpose of green belt. There can be no environmental benefit from building on green belt.

. Fairness. Berkhamsted has already taken more than its share of new development compared with other towns in Dacorum.

Democracy. Reading your report gives me the impression it has been written by people with no knowledge of or feeling for Berkhamsted. The proposals are impractical. Dacorum Council must not be driven by pressures from developers who stand to profit from building large houses on land they have bought as a gamble. Dacorum councillors should listen to residents and not speculators.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-objection-to-Green-Belt-Review-2016-11-01-DEC-SM-Final.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm

- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site

appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of



- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case

providing NO 'sustainable Prosperity' to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor

- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective

- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
  - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land.
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site.

- Proximity to railway line
- Impact on setting of the canal
  
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the A41
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of

new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Encroachment of the urban area along the valley bottom and into adjoining open countryside
- Distance from the town centre services and facilities, employment land and station.
- Impact on setting of the River Bulbourne.
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town



- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12914
<b>Full Name</b>	Valerie Power
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>THE FUTURE OF BOVINGDON VILLAGE</b></p> <p>Central government has set you with a mammoth task, it is your responsibility and duty to go forward with proposals that affect all the people you represent.</p> <p><b>Dacorum Borough Council</b> has for many years in principle fulfilled its duties and responsibilities in a pragmatic and diligent way, particular regarding many people in our community who rely on your support and assistance, it provides in Hemel and it's principle towns adequate benefits and facilities for education, health care, social facilities for the young and the elderly, parks, open spaces, street lighting, road maintenance and much much more, however there is a section of the community who are not fortunate with the abundance of such facilities and benefits but are fortunate enough not to need, or would prefer to receive as little of these benefits facilities as it necessary, it is this group of people who, if certain proposals were made by <b>Dacorum Borough Council</b> and came to fruition would totally destroy this group and put out of balance the personal relationships and harmony that have been established and enjoyed in our small village for so many years.</p> <p>The concerning issues are well documented, facilities such as, schools, doctors and dentists surgeries, car parking, traffic congestion and most aspects of our infrastructure is stretched to breaking point affecting the viability of shop keepers and traders, the safety and wellbeing of many of the village residents in Bovingdon, particular the vulnerable, the children and the elderly.</p> <p>Please be mindful of imminent and current developments programmed, the Tesco development, the McCarthy &amp; Stone development, the development of the old lock up garages site at the rear of the shops in the High Street accessed from Hyde Meadows, these developments and the many planning applications in the planning system will provide many more homes, but will also create even more chaos, congestion and pressure on an already fragmented and overstretched situation.</p> <p>Bovingdon just cannot cope with any more residential development, the current developments mentioned above should not happen, but the power and influence of the property developers seems to override common sense and ignore the wellbeing of the local community, the proposals being made are only a sticking plaster, if the government and local authorities are determined to resolve the housing problem, then look at the bigger picture and please do not spoil our so much loved and valued way of life.</p> <p><b><u>Dacorum borough council please do not ruin our village !!!!!!!!!!!</u></b></p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO12918
<b>Full Name</b>	Debbie Knights
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: enough of the Green land has been developed around the village already. It will also have a negative impact on farming and the local eco-system.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12951
<b>Full Name</b>	Jon Whittle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present</p>

and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-Green-Belt-Review-for-the-DBC-S14-Main-Concept-Plan-2016-06-20.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you

rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be

- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from



- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway

station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the

- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities

- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
  
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision

- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

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- Encroachment of the urban area along the valley bottom and into adjoining open



- Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO12952
<b>Full Name</b>	Anthony Power
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>THE FUTURE OF BOVINGDON VILLAGE</b></p> <p>Central government has set you with a mammoth task, it is your responsibility and duty to go forward with proposals that affect all the people you represent.</p> <p><b>Dacorum Borough Council</b> has for many years in principle fulfilled its duties and responsibilities in a pragmatic and diligent way, particular regarding many people in our community who rely on your support and assistance, it provides in Hemel and it's principle towns adequate benefits and facilities for education, health care, social facilities for the young and the elderly, parks, open spaces, street lighting, road maintenance and much much more, however there is a section of the community who are not fortunate with the abundance of such facilities and benefits but are fortunate enough not to need, or would prefer to receive as little of these benefits facilities as it necessary, it is this group of people who, if certain proposals were made by <b>Dacorum Borough Council</b> and came to fruition would totally destroy this group and put out of balance the personal relationships and harmony that have been established and enjoyed in our small village for so many years.</p> <p>The concerning issues are well documented, facilities such as, schools, doctors and dentists surgeries, car parking, traffic congestion and most aspects of our infrastructure is stretched to breaking point affecting the viability of shop keepers and traders, the safety and</p>

	<p>wellbeing of many of the village residents in Bovingdon, particular the vulnerable, the children and the elderly.</p> <p>Please be mindful of imminent and current developments programmed, the Tesco development, the McCarthy &amp; Stone development, the development of the old lock up garages site at the rear of the shops in the High Street accessed from Hyde Meadows, these developments and the many planning applications in the planning system will provide many more homes, but will also create even more chaos, congestion and pressure on an already fragmented and overstretched situation.</p> <p>Bovingdon just cannot cope with any more residential development, the current developments mentioned above should not happen, but the power and influence of the property developers seems to override common sense and ignore the wellbeing of the local community, the proposals being made are only a sticking plaster, if the government and local authorities are determined to resolve the housing problem, then look at the bigger picture and please do not spoil our so much loved and valued way of life.</p> <p><b><u>Dacorum borough council please do not ruin our village !!!!!!!!!!!</u></b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO12999
<b>Full Name</b>	Edward Keane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p>The roads around Swing Gate are already crowded with cars and children during peak periods (school start, finish, school events, school activities where they leave school such as visiting Church, etc) as they serve 3</p>

schools (Ashlyns, Thomas Coram and Swing Gate). This already causes safety issues for children, and additional traffic and people on these roads will amplify both the crowding issue, increase the likelihood of accidents and will put more lives at risk

The roads in the Hall Park /Swing Gate area will NOT be able to cope with the increased volume of traffic that would occur.

The increased levels of traffic would completely change the nature of the roads of Fieldway, Hall Park Gate. Upper Hall Park.

These are currently quiet residential streets, not built as through roads, but would become the entrance to the east end

of SBC (as there are only 3 ways out of the new development, it is not unreasonable to assume that 1/3 of the traffic will

come via this route). The roads are narrow and often have parked cars so bottlenecks are likely to occur.

Unsustainable increases in traffic levels during construction and as properties are occupied, resulting in additional

traffic burden on our already busy town centre, pressure on parking in town, excessive traffic on Swing Gate Lane (including the safety risks associated with the 2 schools on his route) and contribution to poor local air quality.

The town simply can't take the strain on its amenities from this size of development. Trains into London are already

packed, schools are oversubscribed, there is a lack of parking in the town centre.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly"

the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/05/BRAG-Analysis-of-Green-Belt-Review-for-Hemel-Dacorum-2016-17.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new development.
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density.

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic character. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the

outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:



- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the

grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs –

unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at

- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries

- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major

concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other land.
- Some distance from the town centre
- Next to the Chilterns AONB
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
- Visually prominent site
- Proximity to railway line
- Impact on setting of the canal
  
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open countryside.
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development



at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
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- Encroachment of the urban area along the valley bottom and into adjoining open countryside
- Distance from the town centre services and facilities, employment land and Station
- Impact on setting of the River Bulbourne.
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....

- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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**Include files**

[BRAG response to Issues Options.pdf](#)

<b>Number</b>	Question 46
<b>ID</b>	LPIO13048
<b>Full Name</b>	Bettina Deuse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity to emphasize just a few of the most important points within that response below.</p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to question 46 below (full BRAG response see question 46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial</p>

review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-of-the-DBC-SMVA-2016.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure

sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees

(including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been



- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for

and any other proposed development along Shootersway.

- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles

down the valley at Westbrook Hay and other strategic vantage points

- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and,

during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated.

Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns

- Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- 
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the



	<p>town centre facilities and services - residents won't be walking and cycling to the town</p> <ul style="list-style-type: none"> <li>• Site appraisal recommends exclusion from further assessment and retain as green belt</li> <li>• Site lies within CAONB – large-scale development opportunities to be avoided</li> <li>• At a distance from immediate urban edge and would extend town further into countryside</li> <li>• Close to ancient woodland</li> <li>• Loss of leisure facility <ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13051

<b>Full Name</b>	Sarah Mash
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the proposal to build up to 450 additional houses in Bovingdon. This represents an increase of 25% on the existing housing stock, and will severely stress the service and infrastructure of the village.</p> <p>Specifically, it will:</p> <p>1 Require building on the Green belt, which will alter the environment of the village and destroy the village atmosphere.</p> <p>2 Roads, services such as schools, health surgeries, and importantly drainage will be unable to cope with the additional people cars and water run off. Bovingdon had already had major issues with flooding in Eastnor, and at the memorial, as well as a death of a motorcyclist on the Hempstead Road caused by flooding. Traffic congestion is already a major issue in Bovingdon at weekends and during the rush hours. Box Lane/Hempstead Road is already the busiest 'B' road in Hertfordshire.</p> <p>3 Water provision/availability will be an issue as Bovingdon is at the top of a hill.</p> <p>4 Pollution from as estimated additional 900 vehicles will cause health problems.</p> <p>5 The proposed solution adds no jobs in Bovingdon and thus more travelling will be required for work and schooling.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13101
<b>Full Name</b>	Mr Paul Tinworth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I wish to express my full agreement with the response from the Berkhamsted Residents Action Group regarding Dacorum's Local Plan.</b></p> <p>...</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p>

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-DBC-SW-16-01-17.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide textbook examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put

out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new developments
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density.

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt

- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative

impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'

- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys



- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking

trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage

- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and station
  
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see

a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
- Visually prominent site.
- Proximity to railway
- Impact on setting of the canal.

- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open country-side

- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the A41
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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to the town centre and further afield are good but usage, for any purpose, remains low.

- Encroachment of the urban area along the valley bottom and into adjoining open country side.
  - Distance from the town centre services and facilities, employment land and station.
  - Impact on setting of the River Bulbourne
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's



	<p>traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.</p> <ul style="list-style-type: none"> <li>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13149
<b>Full Name</b>	Hilary Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</b></p> <p>Q36 to 45. 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". Export to another Council area should not be rejected, specifically the St Albans land east of Hemel. There are many more permutations for growth distribution, but clearly DBC have carried out a simple</p>

arithmetic exercise and restricted the options offered to fit with favoured promoted land sites. Over the first 10 years of the current Core Strategy Berkhamsted have exceeded by a massive 34%. All this without any improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% below the target figure. All the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments. Such disparities within Dacorum must be taken into account when assessing development numbers and site options. Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/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. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town's infrastructure constraints and current deficits. As the 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" and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit

to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/05/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-5-1-16-combined.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and

quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the

built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider

community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some

form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway



- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
  
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions

- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Proximity to Chilterns AONB
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents

would walk to and from the town on any pathway provided highly unlikely

- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junctions.
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station.

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the

same Site Appraisal points out the steep gradient and distance

- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the A41
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community

- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area

- Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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	and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13152
<b>Full Name</b>	Mrs Frances Riddle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The village still has a feel of village life, which I feel large scale development would ruin.</p> <p>The roads here are not coping with the present level of residential and passing through traffic. Most weekdays the que to Watford and the M25 is back into Kings Langley High St making problems for local traffic.</p> <p>I object to any Green Belt development in and adjoining Kings Langley. Green Belt is for future generations not for development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13154
<b>Full Name</b>	Ms Anne Duvall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have just returned from a consultation meeting in Berkhamsted Civic Centre and am amazed to learn that 'Conservation Area' does not exclude building on such a site. I had been pleased from your letter to think that Bank Mill Lane was protected from development (unfortunately it was too late to save what is now Townsend estate at the other end of the lane - a blight if ever there was one). So could you please tell me what point there is in designating areas as 'conservation areas'. I am concerned that permission will be given to build 'something' on the site which will then rapidly become something - like the 54 dwellings now on the</p>

former New Lodge site (Townsend). I seem to remember The Mount Prison in Bovington was only going to be a Youth Custody establishment. It is now a Category A prison!

Back to the Bank Mill Site. I'm sure you are aware the two lovely fields presently grazed by horses, has a stream, running through the middle; the visible evidence of the valley's subterranean river which surfaces into a large lake about 1/4 mile further, opposite Broadway Farm and widens considerably at Winkwell.

Some years ago when Townsend was being discussed, a bore hole was made in the fields now up for grabs and water was found only 4' down, not a surprise when you look at the stream. Plans then to build were shelved, and neighbours who wanted to extend etc were turned down because of the area being a 'flood plain'; which it is.

About 35 years ago regulations meant our out-dated cess pit (none of us in Bank Mill Lane are on main drains) had to be replaced with a water treatment plant. This caused a problem of putting it into a high water table and thus it sits mostly above ground.

The valley slopes gently down in a southerly direction taking the water with it, needless to say. So the water is higher here than in the town and again when our Water Treatment Plant was installed the water table was hit at 4' down.

You may remember when the By-Pass was under construction, the field immediately south of the proposed Bank Mill site (adjoining Bullbeggars Lane and the main road) was used to extract the gravel needed. Once the top soil had been removed the underground water was exposed and it became what I thought would have made an attractive boating lake. It has, and probably rightly so, now been reinstated for agriculture though in heavy rain it looks like a paddy field as does the field adjacent that used to have horses in it but slowly became too boggy for that use.

Incidentally the river that runs through the proposed Bank Mill site has to be cleared every few months of reeds, water cress, and debris that flows down from the town. It's blocked as I write and a neighbour has requested it be cleared before it floods.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13155
<b>Full Name</b>	Ms Anne Duvall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	As a last thought, you'll be pleased to know, if you're looking for places to put people; how about Berkhamsted Civic Centre. It's under used and has a big piece at spare ground behind. What about the Town Council moving across the road to the Old Town Hall. The Clock Room would do them wouldn't it? The Police could occupy the 1st floor back room with access to their cars at the back of the Town Hall, and the part time Council tax/rent collectors could operate at the top of the stairs where there's a tea room when in use. I'm sure the Town Hall Trust would be pleased to have the rent. Come to think at it there's another room at the back, ground floor, of the Old Town Hall that I'm not sure is used these days.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13157
<b>Full Name</b>	Nicola Cadogan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am deeply concerned about the impact on our village. The village character will be lost, it will become a suburb of Hemel and a town. There will be coalescence of K/L and Hemel.</p> <p>It is unsustainable with relation to infrastructure in the area. Roads are already at a standstill during peak times and trains are full.</p> <p>Schools, hospitals and GP practices are also at capacity. The proposed Wayside Farm development is uncontrollable and the inclusion of office space a mystery when empty units have resulted into the conversion into flats on Home Park Mill Road.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13173
<b>Full Name</b>	Mr J P Goodings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I believe there is a danger of 30% more growth to Tring population decided by knee jerk reaction to Council planners to fill up Government quotas.

	Tring is a compact market town historic interest and to consider filling up Green field areas with 1,000+ homes will need more schools parking for 2,000+ extra cars, etc.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13200
<b>Full Name</b>	Mr J G Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I moved to Kings Langley specifically so my 2 children could enjoy village life. Go to the local primary school, have all their friends in the area and to feel safe and not part of a big town. The rural setting is beautiful and walks in the woods and along the footpaths around Wayside Farm are a highlight. It would be a very sad if the lovely farm, with its farm shop were to go and be replaced by up to 2,000 houses.</p> <p>The road system currently cannot cope with the amount of traffic. In the mornings it can take 20 minutes or more to get to the M25 roundabout. Absolute gridlock. A large development on Wayside Farm would make morning traffic impossible. This will obviously have serious implications for ambulances/fire trucks and Police to get through.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13201
<b>Full Name</b>	Mr J G Botha
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Getting to hospital in Watford will be particularly bad and there is no hospital near for all the extra people that may move into the area. We have no Police station and a small Fire station. This is of serious concern should there be a fire on the new developments fire trucks will need to come from Watford and Hemel and will struggle to get there through the traffic.</p> <p>I feel that a large development will cause Kings Langley (a historic village) to lose its village feel and will then become a town most likely merged with Hemel Hempstead.</p>

	It will be a very sad day if Kings Langley loses its village status by building on the green belt and i firmly believe that the large-scale developments are infrastructurally unsustainable. I implore you to consider the other sites in the plan over and above Kings Langley.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13204
<b>Full Name</b>	P Baye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am writing to you to protest about the amount of houses proposed for this village. We are a village and would like to stay that way. The High St comes to a standstill everyday with the amount of traffic trying to get to the motorways and schools.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13205
<b>Full Name</b>	P Baye
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The idea of using Wayside Farm which is now used by local people for raw milk + produce is beyond belief a lot more of thought + consideration must be used.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13207
<b>Full Name</b>	Mrs Linda Taylor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	No building on Wayside Farm.

	<p>One of last 2 dairy farms in Hertfordshire. Villagers and other people buy their raw milk here. This is one of last few areas of greenbelt and open countryside left. This would really change village fell and look awful. We certainly do not need anymore offices in Kings Langley. There are enough empty offices in Dacorum area.</p> <p>'Imagination' offices in Kings Langley will probably be emptier soon if 'Apple' have taken away their contracts.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13217
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The proposed development on Station Road/Cow Lane (TR-H4) is very near the cross roads which is already quite dangerous as you cannot see clearly traffic from the station direction as you come down Cow Lane.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13218
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I do think all areas should have a mix of houses and that some areas in Tring are not really suitable at present the proposed development on the North side of the Icknield Way (TR-H6) as at present the canal and feeder to the canal are the boundary for development. I can see that if the proposed development (TR-H6) takes place Little Tring could soon join up with Tring.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13221
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Dangerous cross roads at Cow Lane, Station Road. Poor visibility to the right coming down Cow Lane towards Station Road. If houses are built on the triangle between Station Road and Cow lane road works need to be very carefully planned for safety. Roundabout.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13222
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Site north of Icknield Way would be the start of building all along there. At present Wendover Arm and the feeder to the canal are the border for housing.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13223
<b>Full Name</b>	Mrs Suzanne Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Supermarket car park will need to be enlarged or a larger shop-plus parking. A shop near Tring Station, lighting down Station Road Plenty of green open spaces with trees and shrubs, play areas for children to use their imagination.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13228
<b>Full Name</b>	Mrs Irene McGregor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>HH-H3 - Shendish</p> <p>This site is within the Parish of Kings Langley and, if developed, would put extreme pressure on the local road system. Traffic would travel south through the village of Kings Langley which is already extremely congested at peak times with journey times of 35 mins between the village and M25.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13229
<b>Full Name</b>	Mrs Irene McGregor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-H1 - Hill Farm</p> <p>This site is within the Parish of Kings Langley and, if developed, would put extreme pressure on the local road system. Traffic would travel south through the village of Kings Langley which is already extremely congested at peak times with journey times of 35 mins between the village and M25.</p> <p>Also access to the village High Street would be along narrow roads already congested at peak times.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13230
<b>Full Name</b>	Mrs Irene McGregor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-H2 - Rectory Farm</p> <p>This area is designated as green belt and is vital to maintain non-coalescence with Hemel Hempstead.</p> <p>Rectory Farm has the only undeveloped part of the canal bank between the M25 and Nash Mills and maintains a great deal of wildlife which is gradually disappearing on other parts of the canal.</p>



	<p>Building development would impact on current extreme congestion on the A4251 and put further pressure on local services.</p> <p>It would be an ideal site for a country park offering recreational facilities, allotments and a canal side conservation area.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13231
<b>Full Name</b>	Mrs Irene McGregor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-H3 - Wayside Farm</p> <p>The loss of Wayside Farm as one of the very few working dairy farms would be a great loss to the village. Development here would exacerbate the traffic problems as mentioned above. Travelling around Dacorum one notices unused brownfield sites which could be developed leaving thriving businesses such as Wayside Farm to continue doing a good job and adding to the ambience of Kings Langley Parish.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13232
<b>Full Name</b>	Mrs Mary Tyrrell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We strongly oppose the inclusion of site TR-H5 on land at Dunsley Farm Tring.</p> <ol style="list-style-type: none"> <li>1. The Green Belt and closeness to the Chilterns AONB</li> <li>2. Object to the urban sprawl at this entrance to an old Market Town of great character.</li> <li>3. Farm land should be valued for future food supply.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13233
<b>Full Name</b>	Mr Terry Tyrrell
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We strongly oppose the inclusion of site TR-H5 on land at Dunsley Farm Tring.</p> <ol style="list-style-type: none"> <li>1. The Green Belt and closeness to the Chilterns AONB</li> <li>2. Object to the urban sprawl at this entrance to an old Market Town of great character.</li> <li>3. Farm land should be valued for future food supply.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13234
<b>Full Name</b>	Maggie Dobson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to inform you that I am strongly opposed to the inclusion of Site reference TR-H5 - Land at Dunsley Farm Tring for the following reasons:</p> <ul style="list-style-type: none"> <li>• Green belt - green corridor into town</li> <li>• No need for petrol station and supermarket; area has adequate provision</li> <li>• Adjacent to Chilterns AONB</li> <li>• Loss of valuable farmland, farm shop and existing rural amenities</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13235
<b>Full Name</b>	Ms Stephanie Wells
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I do not wish to comment fully at this time on the proposed local plan for TRING, but wish to object strongly to the inclusion of TR-H5 on this plan.</p> <p>Cow Lane Farm and Dunsley Farm are functioning farm enterprises with long serving tenant families - nearly 100</p>

	<p>years in the case of Cow Lane Farm and 50 years for Dunsley Farm.</p> <p>How can this plan be based on sustainable development (i.e. maintaining environment, community and economy)</p> <p>This plan does not protect the countryside. Cow Lane Farm is a registered wildlife site and also is in the Higher level stewardship scheme ran by Natural England who have invested money as well as the tenant to protect the countryside - is all this effort to be trashed? and will any of the money to be paid back to the farmer and N.E.</p> <p>This site has been overwhelmingly rejected for development in the past being green belt land and seen as green corridor into the town and next to the Chilterns AONB as well as being attractive in its own right.</p> <p>Tring is an pleasant place to live, but it is already plagued by traffic jams in the High Street and the pollution is palatable especially at the Robin Hood crossroads. Not healthy for children in buggies especially. Industrial units and retail units can only increase this congestion a lot of traffic comes off the bypass at this area and Cow Lane suffers many large lorries and cars.</p> <p>It is shortsighted to get rid of farmland. We need to produce more of our own food.</p> <p>Land at Cow Lane Farm was the 1st to be allocated under the Homes for Heroes scheme in 1919 and the present tenants grandfather was the tenant.</p> <p>Cow Lane Farm also has remains of ridge and furrow farming and a footpath across it which was an ancient road both recognised by Natural England.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13240
<b>Full Name</b>	Mr Colin Riddle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the proposed development of additional housing on the Green Belt land in and around Kings Langley.</p> <p>Developments of this size would turn the village of Kings Langley into yet another urban sprawl, which would mean it would become one continuous development between the M25 and Hemel Hempstead.</p> <p>The traffic and parking situation is already of great concern to the village and this type of development would only make the situation worse.</p> <p>Most of the roads leading into the High Street would not be able to cope with this additional traffic at peak times.</p>

	Also there are not enough schools and public services available within the village for this increase in population.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13242
<b>Full Name</b>	P. E. Jewle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>No to building on Green Belt sites</u></p> <p>Please, please don't destroy more of our Green Belt by building houses in a totally unsuitable site. Farmlands are such a wonderful place for our wildlife so very important for the future. Look again at brownfield sites. So many overworked facilities will suffer as well.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13243
<b>Full Name</b>	Mr Keith Bowler
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>With reference to the proposed Local Dacorum Plan, to build 450 new homes in Bovingdon, I have to object to this high amount, on green belt land, and the need to protect the wildlife, and countryside.</p> <p>It is all very well coming up with these wonderful plans, but as usual, no-one thinks about the infrastructure:</p> <ol style="list-style-type: none"> <li>1 More pressure on Watford's A&amp;E</li> <li>2 More pressure on doctors and dentist in Bovingdon (Daily Mail Mon 11/12/17 states that GP surgeries plan to close 33% of surgery's to new patients)</li> <li>3 If these homes are built, it will place more pressure on Green Lane, already difficult to drive up and down, due to parked vehicles.</li> <li>4 More pressure on already creaking utilities services, and increased poor air quality from more vehicles.</li> <li>5 If you direct more traffic onto B4505, Chesham/Hempstead Road you will only be adding to the chaos, to this major road. Has anybody stopped and taken into consideration that the B4505, is only 1 of 3 that takes traffic from east to</li> </ol>

	<p>west, west to east, the only other ones north of London, are the M25, and the A416, that goes from Berkhamsted to Chesham. There is no major roads that carry this traffic every day.</p> <p>6 This plan must be rejected to protect Bovington, and to keep it as a small, and pleasant village, not to become another small town, growing into a big town.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13244
<b>Full Name</b>	Mrs Jennifer Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Enough is enough</p> <p>Berkhamsted's historic character is being ruined by excessive development, as we have exceeded the Core Strategy target by 34% already.</p> <p>We live with constant gridlock.</p> <p>Our water supply and sewage infrastructure are stretched to the limit now. The green belt must NOT be touched, and apart from minor brownfield development within the town, that should be all - we have done our bit.</p> <p>Berkhamsted Town Council should never be over ruled by Dacorum Borough Council - it is our town</p> <p>ENOUGH IS ENOUGH</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13245
<b>Full Name</b>	Mrs Jennifer Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>There are no maternity facilities. Babies have been born on the dangerous bypass. Watford Hospital has horrendous parking problems and is too close to the premier league football ground.</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO13246
<b>Full Name</b>	Mr K. C. Woodward
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The purpose of this letter is to object to proposed plans for further dwellings in Bovingdon.</p> <p>The infrastructure of the village is such that any further increase in population would ruin the village for the current population and our children and grandchildren.</p> <p>We have lived in Bovingdon for 40 years and have witnessed the gradual deterioration, and frankly have had enough!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13249
<b>Full Name</b>	Mrs D. M. Beckley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Following the meeting on the 5th December at Bovingdon Memorial Hall</p> <ol style="list-style-type: none"> <li>1 There is no infrastructure to accommodate 450 new homes in the village</li> <li>2 Traffic in the High St grid locked 24/7</li> <li>3 Transport system unreliable buses <u>only</u> 352 reduced service</li> <li>4 Tesco + flats under construction will <u>only</u> add to the traffic chaos. We already have.</li> <li>5 Field off Green Lane is a flood plain</li> <li>6 Doctors + schools already under pressure.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13251
<b>Full Name</b>	D. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I fully concur with the comments attached from BRAG.</p> <p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>I would like you to consider the over development of Berkhamsted v's Hemel over the past 5/10 years plan.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process (<a href="#">http://www.stalbans.gov.uk/2007/06/20/DBCs-Green-Belt-Review-FAQ.html</a> a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.</p> <p>BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some</p>

discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states:**

##### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density



### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic

character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

#### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition

the gradient between the town centre and the site may make walking and cycling difficult

- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of

Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
  - Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that

bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station
- 
- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic



created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal

- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- 
- Fails to meet Dacorum or Berkhamsted Vision
  - Situated at ridge top location at a distance from employment, retail, health and community services
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage

	<ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> <li>• Fails to meet Dacorum or Berkhamsted Vision</li> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13277
<b>Full Name</b>	D. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I fully concur with the comments attached from BRAG. The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid fill repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed</p>

are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

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NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

(~~as was demonstrated by the DBC's Green Belt Review of Dacorum~~ a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with

developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

**Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed,



especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will

have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.

- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the

likelihood that a high proportion will commute to work or make their journey to the station by private car”

- Berkhamsted railway station and commuter line to Euston is already at full capacity
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
- facilities and services not accessible

- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB

- Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities

- Some distance from the town centre
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41 bypass
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.



Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to

	Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13278
<b>Full Name</b>	Mrs Margaret Beswick
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>I wish to lodge my objections</u> to Tring TR-H5 plan (Dunsley Farm)</p> <ol style="list-style-type: none"> <li>1 An area of outstanding national beauty (AONB)</li> <li>2 No industrial units and warehouses - we already have an industrial area in Tring off Icknield Way</li> <li>3 We already have a supermarket and an M+S in town</li> <li>4 This is <u>valuable</u> farmland</li> <li>5 Just imagine the traffic generated by industry pouring through the town when there's a hold up on the A41.</li> <li>6 The site has already been rejected previously</li> </ol> <p>I vote against this plan.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13279
<b>Full Name</b>	Mr Mike Leon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Having attended the consultation in the Memorial Hall and listened to the arguments, we feel that there should be no large scale development in Bovingdon.</p> <p>The present infrastructure can not cope with any more houses. The roads are full as is the High Street. The</p>

	<p>Bovingdon Academy is full with no room to expand. The village doctors are at full capacity.</p> <p>We value the character of the village which will be lost in the event of any major development.</p> <p>The Green Belt should be protected at all costs</p> <p>We also value the quality of life in our village, which would be ruined if there was any major development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13282
<b>Full Name</b>	Mrs Jill Leon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Having attended the consultation in the Memorial Hall and listened to the arguments, we feel that there should be no large scale development in Bovingdon.</p> <p>The present infrastructure can not cope with any more houses. The roads are full as is the High Street. The Bovingdon Academy is full with no room to expand. The village doctors are at full capacity.</p> <p>We value the character of the village which will be lost in the event of any major development.</p> <p>The Green Belt should be protected at all costs</p> <p>We also value the quality of life in our village, which would be ruined if there was any major development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13285
<b>Full Name</b>	Mrs J. D. Gregory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to protest at the extreme proposed over-development of Kings Langley.</p> <p>The reasons being:</p> <ul style="list-style-type: none"> <li>• Even now the heavy congestion on existing roads</li> <li>• the strain on doctors surgeries</li> <li>• the overwhelming of the local schools</li> <li>• and finally Kings Langley should not become part of Hemel Hempstead but remain a village</li> </ul>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13288
<b>Full Name</b>	Mr Peter Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of Kings Langley for over 50 years, I've seen many changes in the village. However the latest proposed housing developments and the potential change to Kings Langley and its wonderful Historic, individual and proud personality are for me the most scary and sad.</p> <p>The creeping effect of making our village a suburb of Hemel Hempstead New Town for me is distressing, as it is now proven that areas of green countryside are so beneficial to health and well being, and is most certainly the reason that I continue to live here.</p> <p>At present, we struggle to get in and out of the village, especially at rush hour. All you will produce is hours of gridlock with your plans.</p> <p>Finally please preserve our green belt if you want to maintain the respect of the residents of Kings Langley as clearly demonstrated by the turnout at the village meeting to discuss the proposals you have put forward.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13290
<b>Full Name</b>	mr ian mash
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the proposal to build up to 450 additional houses in Bovingdon. This represents an increase of 25% on the existing housing stock, and will severely stress the services and infrastructure of the village.</p> <p>Specifically, it will:</p> <ol style="list-style-type: none"> <li>1 Require building on the Green Belt, which will alter the environment of the village and destroy the village atmosphere.</li> <li>2 Roads, services such as schools, health surgeries, and importantly drainage will be unable to cope</li> </ol>

	<p>with the additional people cars and water run off. Bovingdon has already had major issues with flooding in Eastnor, and at the memorial, as well as a death of a motorcyclist on the Hempstead Road caused by flooding. Traffic congestion is already a major issue in Bovingdon at weekends and during the rush hours. Box Lane/Hempstead Road is already the busiest 'B' road in Hertfordshire.</p> <ol style="list-style-type: none"> <li>3 Water provision/availability will be an issue as Bovingdon is at the top of a hill</li> <li>4 Pollution from an estimated additional 900 vehicles will cause health problems</li> <li>5 The proposed solution adds no jobs in Bovingdon and thus more travelling will be required for work and schooling.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13292
<b>Full Name</b>	Mrs Valerie Nicholson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I live in Bovingdon so am naturally very concerned about the forthcoming proposals in our lovely village.</p> <p>My main concerns are:</p> <ol style="list-style-type: none"> <li>1 Loss of Green Belt - once built on the Green Belt is gone forever</li> <li>2 Lack of infrastructure - Increasing homes without addressing the villages major traffic congestion + parking problems will make both far worse + exacerbate their negative impact on local businesses, air quality, road safety + quality of life.</li> <li>3 Community services at capacity - the school academy is near capacity with no room to expand. Village doctors and dentists are at near capacity.</li> <li>4 Environmental impact. Dramatic increase in homes, population + cars means more pollution. Loss of green Belt, increased water abstraction, drainage/sewer system under threat + increased flood risk.</li> </ol> <p>Without infrastructure improvements, any development in Bovingdon beyond the 90 in the existing plan is not sustainable + will negatively impact the quality of life in our village even further.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13294

<b>Full Name</b>	P. W. Spooner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><u>Dacorum Local plan for Bovingdon</u></p> <p>Thank you for the opportunity to comment on this plan. I have two main points.</p> <p><u>Green belt</u></p> <p>The green belt is essential for Bovingdon to remain a country village. Not only does it prevent the uncontrolled spread of houses into the countryside it also limits the growth of the village population due to the finite availability of land inside the belt.</p> <p>In the past the Dacorum Council has maintained tight control of this green belt and it would be a great pity if this control was loosened to accommodate the additional houses required by the Plan when other solutions are available e.g. Option 2B.</p> <p>Bovingdon is already a big village and further expansion in physical size and population risks losing its identity and community spirit.</p> <p><u>Traffic flow and parking</u></p> <p>At various times serious traffic congestion occurs in Bovingdon High Street, Box Lane and Green Lane so any additional traffic from more houses together with the expected general increase in traffic will make a bad situation worse.</p> <p>In the rush in the mornings most traffic is leaving the village, in the evening rush it is returning. Therefore Bovingdon is effectively a commuter cillage. If new houses are built nearer to Industrial and Commercial centre the extra traffic generated by new houses would not add to the congestion and as a bonus there would be less car miles.</p> <p>The lack of any new car parks in the plan exacerbates the situation.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13296
<b>Full Name</b>	Mrs Pamela Cockerill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>I am writing to record my strong objections to the proposed development of Dunsley Farm site - option TR-H5- on the following grounds:</p> <p>On 2009 two sites were proposed for development:</p> <ol style="list-style-type: none"> <li>1 one at the west end of the town beyond the cemetery and south of Icknield Way - now granted to Cala Homes for 240 houses and</li> <li>2 Dunsley Farm site at the eastern end of town.</li> </ol> <p>Residents of the town completed a survey and voted overwhelming for the western option, the Dunsley Farm site being completely rejected. This choice must be honoured.</p> <p>The town has no need of another supermarket. It would take even more trade out of out town. We need shops IN the town, supporting local independent traders. Neither do we need another petrol filling station.</p> <p>The schools, and doctors surgeries in particular, cannot cope now, neither can the car parks, and from June next year there will be no banks in the town. Where is the additional infrastructure coming from?</p> <p>This is another case of Green Belt land and good farmland being sacrificed for a totally unsuitable development, whose only benefit will be to the large consortium building companies chasing contracts, and who have no interest in the town.</p> <p>NO on every account to Option TR-H5.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 46</p>
<p><b>ID</b></p>	<p>LPIO13297</p>
<p><b>Full Name</b></p>	<p>Mrs Kay Watts</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>
<p><b>Your response - Please add your response here</b></p>	<p><b>I object to the proposed development on the Green Belt in and around Kings Langley because:</b></p> <p>Having seen the proposed strategic plans for the Village of Kings Langley and Shendish I feel very strongly that I have to make my feelings known as a resident for more than 40 years.</p> <p>In my opinion the village and its amenities are already stretched to near breaking point, the roads are packed solid and frankly dangerous at many times in the day. We have an infrastructure at the moment that just about copes, more loaded on top and the whole lot would most likely become unstable and cease to work efficiently if at all. I believe the government is looking to build houses to alleviate the homeless and inadequately housed people of this country, very laudable but misjudged as housing in Kings Langley is out of the reach of most locals. The value of properties here skyrocket as soon</p>

	<p>as they are built, so you may say they are going to be a mix of sizes prices, etc. but we all know in reality this will not be the case.</p> <p>The history and character of this village is what makes it so very special and worthy of maintaining in its present form, how many villages in Hertfordshire has the remains of a Royal Palace dating from 1276 (the Priory building which remains to this day) and the first Duke of York buried in the church.</p> <p>Building on these proposed sites would begin to merge Kings Langley with Hemel Hempstead, forever losing the status of Village and its individuality, something that can never be reversed once the stupidity of a decision to build is realized.</p> <p>I believe the strength of my feelings were echoed by the 800 plus people attending the village meeting, and I feel confident that as our representatives you will make the only decision possible in light of such opposition to your proposals and that it to turn down the plans, and thus at the same time preserving the green belt, for yours and my heirs.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13298
<b>Full Name</b>	Mrs Kay Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I also have to mention the madness of threatening to lose the Jersey Dairy Farm which is becoming renowned for its raw milk. Losing large chunks of its green spaces, farms and parts of the Shendish Estate would diminish for ever something that is so very precious not only to those of us that are lucky to live here but to those people who come to school, visit or work here as well.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13300
<b>Full Name</b>	Mr David Hash
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes



<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the proposed to build up to 450 additional houses in Bovingdon. This represents an increase of 25% on the existing housing stock, and will severely stress the services and infrastructure of the village.</p> <p>Specifically, it will:</p> <ol style="list-style-type: none"> <li>1 Require building on the Green belt, which will alter the environment of the village and destroy the village atmosphere.</li> <li>2 Roads, services such as schools, health surgeries, and importantly drainage will be unable to cope with the additional people cars and water run off. Bovingdon has already had major issues with flooding in Eastnor, and at the memorial, as well as a death of a motorcyclist on the Hempstead Road caused by flooding. traffic congestion is already a major issue in Bovingdon at weekends and during the rush hours. Box Lane/Hempstead Road is already the busiest 'B' road in Hertfordshire.</li> <li>3 Water provision/availability will be an issue as Bovingdon is at the top of a hill.</li> <li>4 Pollution from an estimated additional 900 vehicles will cause health problems</li> <li>5 The proposed solution adds no jobs in Bovingdon and thus more travelling will be required for work and schooling</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13302
<b>Full Name</b>	S.A. Grimes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to protest at the plans to build up to 260 new homes in Bovingdon. The reasons are as follows:</p> <p>The village which is already bursting at the seams cannot cope with:</p> <ul style="list-style-type: none"> <li>• more children requiring schooling</li> <li>• more cars on the already over crowded roads (parking in the village centre is absolutely dreadful now)</li> <li>• more pressure on the medical services</li> </ul> <p>I am particularly concerned about flooding. Although the recent flooding did not reach my house, it was very bad further down my road. The drains do not cope with torrential rain. Building more houses on clay soil will lead to flooding in streets near The Well and other areas.</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO13306
<b>Full Name</b>	Mrs Diana Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The green belt is the area which acts as a buffer and therefore protects Chiltern Area of Outstanding Natural beauty and we are nibbling away at that buffer. I do not believe this green belt area which protects Berkhamsted, an important historic small market town built in the valley with steep sides in a linear manner in amongst and part of the Chilterns, abutting the Chilterns AONB, is the correct place for mass increase in housing. The setting and character of Berkhamsted needs to be protected. The CAONB is considered to be 'nationally important'.</p> <p>The bypass A41 was constructed to by pass our town, do we want to build up to it now? What is the quality of life and health living beside a busy road such as this? Can the short run ons and offs of A41 cope with increased traffic movements?</p> <p>Immediate thoughts are that there is a serious need for the whole infrastructure to be upgraded/improved before we permit increased numbers of houses to be built in Berkhamsted especially the numbers that Dacorum would like us to consider. Schools, hospitals, doctors/dentists, services for the community and traffic flow with parking considerations all need to be well planned and built before we propose increased development in numbers of housing. The growth in housing over the past 10 years has impacted significantly as the market town is physically limited with narrow streets and linear valley with rail and canal acting as a restriction. We should ask the question, what do we need rather than what do the developers want?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13309
<b>Full Name</b>	Mrs Diana Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In particular, my objection for the use of BE-H3 Green Belt land at Ivy House Lane, Berkhamsted is based on several reasons:

- 1 The site forms the head of the rural dry valley which runs continuously down the CAONB so views in and out of that area will be affected especially looking from Bullbeggars Lane, possibly A4251 and A41. Although spacious housing is currently along the southern boundary at Meadway/Ivy House Lane and north along the Common, these are set back from the green belt with mature trees/hedging, large gardens and on the ridge/crest therefore not highlighting these developments. The west boundary along Hunters Park is more open but still spacious with mature vegetation protecting the views within the AONB.
- 2 The site appraisals SA working note Oct 2017 on this site BE-H3 highlights poor accessibility to local facilities especially schools. The steep gradient of the site valley makes it less suitable for walking and cycling into town. The local play space it offers to provide, claims it is a benefit but surely the woodland and countryside immediately surrounding this area provides that already? Housing in that site would not be affordable to most.
- 3 The site has poor road access and, before any consideration to remove this from the green belt, a full and detailed document should account for access and design as it is only accessed by a narrow single track lane with a few passing points. I am familiar with this as a pedestrian and dog walker, I have encountered several dangerous traffic incidents. An accident is waiting to happen never mind if 150/125 houses are built. This valley between the Common and Meadway is steep on both sides and in wintery conditions, the lane slippery and dangerous. Access through the adjoining neighbourhood is unlikely and not detailed as there is an unadopted private road with width restrictions at each end.
- 4 In Dacorum documents, sustainable development strategy, page 14 1.30 states that 'general demand for development is not reason in itself for change' of land from Green Belt. Being on the settlement edge, where spacious detached housing surrounds this site, does not naturally bring it forward as a site for higher densities. 150 houses proposed was then 125 houses but the covenant on the land stated 1/3rd acre plots. This will seriously reduce the numbers to max 39 but with roads and access within to the new homes, this will be further decreased. The promise of 40% affordable homes will therefore not be met. This valuable undulating rural farm land should not be sacrificed for unattainable promises.
- 5 To permit housing on this site would impact the character and amenity of the area with increased traffic and noise, light pollution, air pollution wildlife habitat and farming area. The slope of the land would intensify the urban landscape of a new development rather than blend into the character directly adjoining AONB where its fundamental character is openness.

	<p>6 The land should ideally be parcel of Chiltern AONB as this forms the head of the rolling chalk arterial valley flowing into the AONB, having relationship and collecting water for the aquifer at Bulbourne which we rely on for our water supply. This should be considered to be included in the AONB as it is important.</p> <p>In conclusion, along with my reasons as stated above, I believe Green Belt land particularly close to AONB should not be used to create housing in Berkhamsted and therefore Option 1B is my priority.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13313
<b>Full Name</b>	Mrs Diana Calderwood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Government projection for housing requirements means there is a call for considering an option for a new town, not within AONB, and a new town would provide the schools, hospitals, services, infrastructure which their numbers of houses demand and could benefit from new and good design with layout.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13315
<b>Full Name</b>	Mrs Maureen Dyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I strongly object to the proposals of plans for building in Kings Langley.</p> <p>Although not complete yet B+M care home is being built at the bottom of Langley Hill, a junction to the High Street which will bring further traffic to the village. Also McCarthy + Stone <u>if</u> (hopefully not) they get permission will again increase congestion.</p> <p>Kings Langley only has one fire engine, and if any resident has the unfortunate need for an ambulance, with all this proposed buildings it would take at least 30 minutes to get to Watford. Babies will be born en route and patients might die.</p>

	<p>No more development in Kings Langley. The village wants to keep its identity not become Watford or Hemel Hempstead.</p> <p>When in years ahead e.g. 2050 and beyond and the population hereabouts asks 'whats a green belt? where is it?' I hope the planning committee then will say 'Kings Langley residents did try to keep it but the planners at the time in 2017 failed them'.</p> <p>I have lived in this village since 1941 and would like future generations to enjoy Kings Langley as I have.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13316
<b>Full Name</b>	Mrs Maureen Dyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Wayside Farm should not be considered for development, the impact would be devastating not only the farmer would lose his livelihood but also his home, and it would be encroaching on the green belt, and merge with Watford.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13317
<b>Full Name</b>	Mrs Maureen Dyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Shendish again not a good plan - if that was considered the green belt would go and Kings Langley will become Apsley or Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13318
<b>Full Name</b>	Mrs Maureen Dyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Hill Farm which would mean extra traffic on Chipperfield Road and Whippendell Hill and eating away more green belt.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13319
<b>Full Name</b>	Mrs Maureen Dyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Rectory Farm another impact on the A4251 through the village High Street, at times which is gridlocked and buses have a job to get through please let us keep our village not over develop it.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13322
<b>Full Name</b>	Mr Ken Hughes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Not just this location, but across Berkhamsted, has saturation point been reached with housing + its consequent impact if relation to the volume of traffic it brings. Not to mention infrastructure problems.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13324
<b>Full Name</b>	Jean Barret
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Not just this location, but across Berkhamsted, has saturation point been reached with housing + its consequent impact if relation to the volume of traffic it brings. Not to mention infrastructure problems.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13326
<b>Full Name</b>	B Brein
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Not just this location, but across Berkhamsted, has saturation point been reached with housing + its consequent impact if relation to the volume of traffic it brings. Not to mention infrastructure problems.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13328
<b>Full Name</b>	Mr Colin Titmus
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Not just this location, but across Berkhamsted, has saturation point been reached with housing + its consequent impact if relation to the volume of traffic it brings. Not to mention infrastructure problems.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13330
<b>Full Name</b>	Stephanie Titmus
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Not just this location, but across Berkhamsted, has saturation point been reached with housing + its consequent impact if relation to the volume of traffic it brings.</p> <p>Not to mention infrastructure problems.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13333
<b>Full Name</b>	Janet Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Looking at the Council's map of possible development sites, this danger is apparent if the sites proposed for the Kings Langley area were to be utilised. It is clear that the village would be swallowed up by new development and the village environment currently enjoyed by residents would be destroyed.</p> <p>At your recent exhibition in Kings Langley one of your officers explained that most of the decisions about new infrastructure which we felt would be required should there be any significant development of the Kings Langley sites would not be in the Council's hands and in any event would not be addressed until the plan had been agreed.</p> <p>From our experience traffic volumes in Kings Langley have grown to a point where traffic flows in the High Street are reduced to a crawl. The situation is now significantly worse than it was before the by-pass was built! And not just during rush hours. A fortnight ago at 2.30pm Janet was waiting for a bus to go into Watford at the stop opposite the Rose and Crown and saw the 500 double-decker at the Hemel end of the High Street - but still had to wait more than 5 minutes for the bus to reach her stop, given the problems with parked cars and large lorries.</p> <p>Despite its recent expansion the Nap Surgery is very busy and parking spaces at a premium. Keith - who has mobility problems - often makes early morning appointments - before 9.00am - to be sure of finding somewhere to park.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13334
<b>Full Name</b>	Janet Fanshawe
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The statement that the Wayside Farm site could be developed either with offices and 100 houses or 2,000 houses is ridiculously vague. It would also lead to the loss of productive farmland.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13335
<b>Full Name</b>	Mr Keith Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Looking at the Council's map of possible development sites, this danger is apparent if the sites proposed for the Kings Langley area were to be utilised. It is clear that the village would be swallowed up by new development and the village environment currently enjoyed by residents would be destroyed.</p> <p>At your recent exhibition in Kings Langley one of your officers explained that most of the decisions about new infrastructure which we felt would be required should there be any significant development of the Kings Langley sites would not be in the Council's hands and in any event would not be addressed until the plan had been agreed.</p> <p>From our experience traffic volumes in Kings Langley have grown to a point where traffic flows in the High Street are reduced to a crawl. The situation is now significantly worse than it was before the by-pass was built! And not just during rush hours. A fortnight ago at 2.30pm Janet was waiting for a bus to go into Watford at the stop opposite the Rose and Crown and saw the 500 double-decker at the Hemel end of the High Street - but still had to wait more than 5 minutes for the bus to reach her stop, given the problems with parked cars and large lorries.</p> <p>Despite its recent expansion the Nap Surgery is very busy and parking spaces at a premium. Keith - who has mobility problems - often makes early morning appointments - before 9.00am - to be sure of finding somewhere to park.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13338

<b>Full Name</b>	Mr Keith Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The statement that the Wayside Farm site could be developed either with offices and 100 houses or 2,000 houses is ridiculously vague. It would also lead to the loss of productive farmland.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13345
<b>Full Name</b>	Mrs Christine Pettit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Shendish is in the parish of Kings Langley and should be noted as such. This is an important greenbelt area dividing us from Hemel Hempstead, a haven for wildlife and walkers.  The access to this site would be onto Rucklers Lane. This is a narrow lane densely built on near the junction of the A4251 which is already a bottleneck with single line traffic in places.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13346
<b>Full Name</b>	Mrs Christine Pettit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Hill Farm  My main objection to this site is that the access would be onto Love Lane or Chipperfield Road. The only access to the A4251 from here is down four steep lanes, two of which are very narrow and all of which are clogged by parked cars. The three schools within a few hundreds

	yards of this site mean that at peak times these roads are already gridlocked and impassable.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13347
<b>Full Name</b>	Mrs Christine Pettit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Rectory Farm</p> <p>This is the last piece of land separating Kings Langley from Apsley along the route of the canal. All other canalside sites have been densely developed. I have no objection to development on the sites of the existing building, hopefully for low cost housing for local people. The rest of this site should be retained as a last refuge for waterside wildlife and community use.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13348
<b>Full Name</b>	Mrs Christine Pettit
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Wayside Farm</p> <p>This farm (one of the last dairy farms in Hertfordshire) is an intricate part of our village community. Its raw milk and farm shop are an important part of our village. Mr Wray welcomes families under supervision to see his animals. Once a year he holds a free open day when local people can have an enjoyable day out and the children can learn about farming.</p> <p>This huge site forms an important division between Kings Langley and the surrounding communities and is a haven for wildlife (there are still skylarks nesting in the fields) and walkers on its rural footpaths.</p> <p>Kings Langley could not absorb this huge increase in population without destroying its village character.</p> <p>Any roads on this site would exit on to the A4251 and then to the A41. Both are already overused and often gridlocked routes.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO13434
<b>Full Name</b>	Mr Alan Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am opposed to the development with in Kings Langley including Shendish. We are a village and do not wish to lose our identity and become a part of Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13435
<b>Full Name</b>	Mrs Christine Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am opposed to the development with in Kings Langley including Shendish. We are a village and do not wish to lose our identity and become a part of Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13437
<b>Full Name</b>	Mr Peter McClelland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The infrastructure of the village and surrounding area is already overstretched unable to cope with any additional demands. However even if the funding were available, major changes would destroy the pleasant village atmosphere and the present community spirit.</p> <p>The main factors limiting any further expansion of Bovingdon are:</p> <ul style="list-style-type: none"> <li>• Traffic on the B4505 and the surrounding lanes</li> </ul>

- Traffic and parking on the High Street
- Bovingdon school is full and cannot expand
- Shortage of recreational land
- Pressure on medical services
- Risk of flooding
- Risk of water shortage

The B4505 runs from Hemel Hempstead through Bovingdon to Chesham. It is the busiest B road in the country and horrendous jams occur from time to time, particularly when the market on Bovingdon airfield is open. It can take up to an hour to travel between Bovingdon and Hemel Hempstead. This is a major hazard for the emergency services as there is no room to pass stationary traffic over much of the distance. To avoid the congestion consideration numbers of people use lanes such as Flaunden Lane which are only one vehicle wide, leading to further jams and frustration. It is worth noting that there is little opportunity for employment in Bovingdon so every additional dwelling will result in one or two more cars using the B4505 to travel to work.

Bovingdon is well served by a variety of shops which are family businesses catering for most everyday needs. The High Street has a busy, friendly village atmosphere which attracts newcomers and contributes to the quality of life of the residents. However, there are no more than a dozen parking spaces in front of the shops in the centre of village so there are always cars parked on one side of the upper section of the High Street. This causes congestion, with vehicles mounting the footpath to pass each other.

The spatial strategy for Bovingdon issued in 2009 noted that the village school was full and that there is no room on the site for expansion. For a short period children had to be bussed to Kings Langley and the school has remained full ever since. At present there are 451 children on the school roll and only 3 places available.

A Hertfordshire County report some years ago noted that Bovingdon has the least public recreational land per capita in the whole of the county. The only significant areas are the small King George V playing field behind the school and Bovingdon Green, which is on the periphery of the village.

In common with most areas, medical services are under pressure. The larger practice in the village is part of a practice in King's Langley so we frequently have to travel to King's Langley if we want a timely appointment. The parking problem in Bovingdon means that unwell patients may have to walk several hundred yards to the surgery.

Although Bovingdon is on a plateau the lower part of the village is a hollow with no natural outlet. This, combined with the impervious clay soil, has led to severe flooding as recently as last winter when many houses were inundated. In contrast to this and in common with much of the south east England there is an ongoing threat of a water shortage. A Dacorum environmental assessment states that there is pressure on the water supply with little margin in hand.

In summary, the village is already under stress for reasons above and the addition of further houses would

	make an uncomfortable but bearable position into a local disaster.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13483
<b>Full Name</b>	Mrs Catherine Imber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p><b>NB</b> this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>The improvements to the Shootersway/Kings Road junction have alleviated the congestion such that it will be able to cope with the existing agreed developments. The additional proposed developments along Shootersway combined would put a huge strain on the road capacity and the junction with Kings Road would again become a bottleneck. School traffic causes the worst problems, and since there are no state senior level schools on the south side of the town other than Ashlyns, all traffic will come to the Kings Road junction.</p> <p>The existing agreed developments on Shootersway , together with the highways policy of sending traffic around the town via Shootersway, have contributed to high traffic levels.</p> <p>We would be surprised if there is not a covenant on the land at Haslam's Field. That land was given by the Haslam family (originally to the Girls' School) for use as a playing field, and not as an asset to be sold for development. It is not in the spirit of the gift to sell it off, especially as the school does have a playing field at Haresfoot (one of the main reasons for selling according</p>

to the letter sent by the head to parents of students at the school).

Central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-Header-DEC-14-M-Final.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide textbook examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for

development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street.



Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions

- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of

Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a

junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site.



We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated

- Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in

	<p>Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</p> <ul style="list-style-type: none"> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13531
<b>Full Name</b>	Deborah Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p>

Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-DBC-SMVA-2016.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main

routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canal side environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.



## **Comments on individual sites**

### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive

- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility

- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was

very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

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  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB



- Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident

- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision

	<ul style="list-style-type: none"> <li>• facilities and services not accessible</li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13535
<b>Full Name</b>	John Rush
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In particular I wish to register my objection to the proposed development of the Field in Ivy House Lane for the building of up to 150 houses. Apart from the use of Green Belt Land closely adjacent to an Area of Outstanding Natural Beauty, access to the site both during development and for any residents thereafter will be very difficult.</p> <p>Ivy House Lane is a narrow country lane with only a single and poorly built carriageway. There are no official passing places for traffic at present, a problem that will be exacerbated by the succession of builders' vehicles that will need to reach the site. From the Medway junction with Sunnyside toward the town, the road does</p>

widen but is then restricted to a single carriageway by the railway bridge. If that railway bridge is replaced as has been suggested the turning to the left down Bank Mill Lane is narrow, has a 90 degree bend a single carriageway canal bridge. Equally, turning to the right after the railway bridge leads into George Street which is already heavily congested and culminates with a difficult exit onto Ravens Lane/Gravel Path. There is no logical traffic path along Station Road, which is already heaving congested and requires a complete rebuilding of the carriage way. Lastly the exist on to the A4251 is difficult and suffers from poor visibility due to cars parked on the main road and present parking arrangements in Ravens Lane.

Leaving Ivy House Lane towards Potten End or Ashridge is also difficult. The exit is close to a dangerous crossroads at the top of Gravel Path where many accidents already occur. The roadway exit is narrow and the sight lines are inadequate given the present speed of traffic coming from Potten End.

The alternative of a possible access through Hunters Park onto Gravel Path presents further problems. Gravel Path is already subject to considerable traffic, frequently moving faster than the speed limit, and disregarding the hazards presented by large number of private driveways. Please refer to the report and statistics from the Safer Gravel Path Action Group dated 29th May 2017. The line of sight at the Hunters Park exit is somewhat restricted in both directions. Traffic also debouches onto Gravel Path from Byways, Shenstone Hill and Headlands Drive immediately opposite the Hunters Park exit. Should access be via Hunters Park the additional volume of traffic generated by 150 house owners together with related service and delivery vehicles will create more severe traffic problems for all users of Gravel Path.

Access through Meadway would be via a private thoroughfare which, even if could be negotiated, would be subject to the same problems of where the traffic could safely go when reaching either Gravel Path or Ivy House Lane.

The topography of the site with steep slopes will create difficulty with dealing with runoff water with the danger, that unless suitable rainwater drains are created, the farmland on the other side of Ivy House Lane will receive a considerable volume. At present rainwater already collects in the lane at the dip, and takes time to disperse, but will be exacerbated by the prevention of normal field water absorption with the laying of impermeable road and pavements on the slopes, which for building purposes are steep and will require considerable investment. Affinity Water, in their regular bulletins, report problems with maintaining supply to the existing housing stock in the area with the implication that the infrastructure is already under stress.

At present the capacity of the sewage drainage in Hunters Park, which runs across the field down the dry valley, is already inadequate for the present 20+ householders connected, and causes backup problems from time to time. It would therefore be wholly unsuitable

	<p>to join any new development into the existing drainage system.</p> <p>The proposal for up to 150 dwellings at a density of 30 dwellings per hectare is totally at variance with the existing housing stock in the area and out of character with the area. Hunters Park, for example has a density of around 6 dwellings per hectare – Meadway, Gilpings Ride and Millfield event les per hectare.</p> <p>The pre-existing developments in the Gravel Path area are largely dependent upon car usage to reach schools, shops and medical facilities. Since there is no mention of such facilities being provided on the proposed site we may assume a high level of car ownership will accrue. Reference to the proximity of the very occasional bus service along the Potten End Road might be true but seems unlikely to be much used, if at all by any new residents of this proposed development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13537
<b>Full Name</b>	John Rush
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>It is clear to me from the options offered that development would be infinitely easier and more economical if concentrated upon Hemel Hempstead. Apart from the Old Town centre, Hemel Hempstead has been planned over the last 60 years and has the infrastructure to cope with additional demand, rather than expanding on the outlying market town and villages. Berkhamsted is a victim of its position in a narrow valley with steep slopes and the northern part of the town is set apart from the centre by the railway and canal making access to necessary facilities more difficult and expensive. Berkhamsted's infrastructure is already under great strain and the building of yet more houses can only exacerbate this position.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13539
<b>Full Name</b>	Philip and Lesley Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We write to you with reference to the above document and in particular page 122. We understand from the document that the Planning Committee is considering the development of land near Ivy House Lane, Berkhamsted and land to the south of Berkhamsted (175 and 1000 new homes respectively). As residents who have been living in this Area of Outstanding Natural Beauty for over ten years, we have severe reservations about the plans.</p> <p>As residents who also work locally in the town and in London we have good knowledge of the challenges to our transport networks. The infrastructure of Berkhamsted will struggle to support any further expansion. The morning and evening trains are already challenged and the A41 is regularly gridlocked. We note from option plans that there is proposal for only one GP practice and one primary school on the Shootersway side. It can currently take 3 weeks to get a GP appointment in Berkhamsted and our local hospitals are similarly challenged. Absorbing further homes on the scale proposed will remove the very quality of life that attracts people to live and work in Berkhamsted and will irreversibly affect the character of an ancient market town in an Area of Outstanding Natural Beauty. This will be lost forever.</p> <p>I hope you will consider these objections in the manner that they are presented: form two local residents with an appreciate of the local history and beauty.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13540
<b>Full Name</b>	Philip and Lesley Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Access to Ivy House Lane is poor at both approaches. It is a single lane road with few passing places and single lane canal and railway bridges at its's lower end. It is dangerous in winter due to its steep inclines and it floods regularly. A traffic increase in the area carries risk to both pedestrians and car users. Gravel Path offers similar challenges to drivers.</p> <p>Ivy House lane is an ancient road which significantly adds to the natural beauty of the landscape. At the top approach to the lane are a group of ancient listed buildings dating from the 1600s. These are of major local historical important and appear in the town's historical archives, as does the field proposed for development. Your document mentions the importance of tourism to</p>

	<p>the economy of the area. Our Green belt lands and AONB are the locations that encourage tourists to our town. Removing these from our landscape would appear short-sighted when considering the future of our historical town's economy and cultural potential.</p> <p>The fields abutting Ivy House Lane are home to considerable wildlife and hedgerows. Deer, badgers, birds of prey and insects make their homes there and do so because there is minimal noise and light pollution. Planning consent has already been granted for 4 large homes on the site of the farm buildings at the top of Ivy House Lane (we note that is not shown on the option plans). When we objected to this development it was due both to the pressures this would place on the road but also the risk to wildlife. We raised concerns at the time about the development by stealth. If the field is given over to similar development then we must ask the question, what next and is it the town or the developers that gain most?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13579
<b>Full Name</b>	Sue & Fraser Miller
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Our village (Bovingdon) cannot cope with a 20% increase in homes as we already struggle with;-</p> <p>traffic and parking on the High Street</p> <p>large volume of traffic on the B4505 and surrounding lanes (especially in rush hour and market traffic on Saturdays).</p> <p>full school with no room to expand.</p> <p>shortage of recreational spaces</p> <p>increased risk of flooding</p> <p>insufficient water and sewerage for additional homes</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13589
<b>Full Name</b>	Mr Alan O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation.</p> <p>To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development. Development of this agricultural land would destroy the rural character of Berkhamsted and ruin the Chilterns natural beauty.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process (see <a href="http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Advice-on-Belvoir-Hill-DC-5-11-14.pdf">http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Advice-on-Belvoir-Hill-DC-5-11-14.pdf</a> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point</p>

and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites –

detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic

character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town

- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate

Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to

Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats

including Long Green wildlife site and  
Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity



- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually

- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently,

12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets"

such as the Grand Union Canal and the River Bulbourne”

- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the

- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility

	<ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13592
<b>Full Name</b>	Sylvia Jones
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because:

	<p>The traffic problems on the old A41 are already tremendous.</p> <p>Green Belt is important + the loss of farming land would be tragic.</p> <p>What is the use of having 'Green Belt' if it can be built on. There must be plenty of 'Brown' sites around.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13593
<b>Full Name</b>	Vicky Dunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 of the loss of amenities and valued landscape - public access, abundance of wildlife and flora</li> <li>2 lack of suitable road + public transport</li> <li>3 over-worked local GP services</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13639
<b>Full Name</b>	Sue O'Neill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development. Development</p>



of this agricultural land would destroy the rural character of Berkhamsted and ruin the Chilterns natural beauty.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Framework-for-DBC-SMVA-com.pdf>

for a full analysis of stage 1). In short, both of the DBC commissioned papers provide textbook examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the

Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built

and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly

Swing Gate Lane and any potential to upgrade

- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.

- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of ‘bus loop’ not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet

requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway



station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane

- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
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services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB
    - Suggestion of potential new primary school – not part of Berkhamsted education policy
    - Lack of secondary school capacity – Ashlyns School
    - Same arguments on accessible housing – distance from facilities and services

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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

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appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town

	<ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13642
<b>Full Name</b>	Moira and David Lea
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are writing to object to the proposals for, the unsupportable amount of housing proposed for the green field sites between Bulbourne Road and Station Road through to Tring Station.</p> <p>Our objections are listed below but our major concerns are for the supply of drinking water, loss of a nationally important area of Green belt land leading to the nationally important Area of Outstanding Natural Beauty and the lack of evidence that all proposals can be supported with finance, not just for Tring but in its context major developments proposed for the surrounding area, particularly with regard to Aylesbury, which although technically is across a county border, will have significant impacts as whole for the area and for infrastructure.</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO13701
<b>Full Name</b>	Tim Uden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial</p>



review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-of-the-DBC-SM-Facing-for-a-full-analysis-of-stage-1>). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure

sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees

(including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
  
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for

and any other proposed development along Shootersway.

- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles



down the valley at Westbrook Hay and other strategic vantage points

- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and,

during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
  
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated.

Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns

- Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional

traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the

	<p>town centre facilities and services - residents won't be walking and cycling to the town</p> <ul style="list-style-type: none"> <li>• Site appraisal recommends exclusion from further assessment and retain as green belt</li> <li>• Site lies within CAONB – large-scale development opportunities to be avoided</li> <li>• At a distance from immediate urban edge and would extend town further into countryside</li> <li>• Close to ancient woodland</li> <li>• Loss of leisure facility <ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13704

<b>Full Name</b>	Aya Abu-Qalbain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because:  I think that we need more green space. This will reduce the amount of carbon dioxide in the air, decreasing air pollution.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13705
<b>Full Name</b>	Mr Paul Swain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am fore the new development The next generations need homes too!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13706
<b>Full Name</b>	Roman Brooks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because: <ul style="list-style-type: none"> <li>• object</li> <li>• impact on village of Kings Langley</li> <li>• use of amenity area for produce, dog walking and appreciate the working farm</li> </ul> * Unable to fully read the hand written text
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13707

<b>Full Name</b>	Charlotte Wadsworth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object in the strongest terms to the proposed sites BOV –h 1,2,3 and 4 in the Dacorum Core Strategy.</p> <p>Specifically I would make the following comments :</p> <ul style="list-style-type: none"> <li>• The proposal conflicts with Central Government’s and Dacorum’s Core Strategy to “minimise impact on Green Belt” and “safeguard the countryside”.</li> <li>• The main ‘B’ road from Hemel to Bovingdon is already the busiest in Hertfordshire and these proposals would see a major increase in traffic which will only add to the existing problems facing the village with regards to parking, road safety and air quality. Significant investment is already required to solve these problems before any housing is built.</li> <li>• The current public transport to Hemel and Chesham train stations is woefully inadequate and will mean the increase in private transport to and from the village is set to be in direct ratio to the increase in housing.</li> <li>• There is currently no foot or cycle paths from the village to either Hemel or Chesham station and with the lack of public transport private car will be the only practical way of accessing these facilities.</li> <li>• Community services in the village are already at maximum and these would need to be addressed before any increase in housing.</li> <li>• Currently the village has environmental issues with regard to water abstraction, drainage/sewer system, and localised flooding particularly at the Ryder memorial and Hempstead Road entering the village (near proposed BOV –H4 site). Without significant investment and modernisation increase in housing to the level proposed would have significant impact on quality of life for the existing community.</li> <li>• The proposals would represent a 25% expansion of the village which in itself is likely to cause a significant and unreasonable impact on the quality of life on the existing community made worse by the no plans to improve the existing inadequate infrastructure.</li> <li>• No plans to ensure that the significant revenues generated by the development of these sites returns taxed income to the community to improve the infrastructure. It is already apparent that the land owners are developing these sites through self-owned corporations to minimise ‘costs’.</li> </ul> <p>These sites are being proposed and pushed by the land owners seeking to turn Green Belt in to building land and return huge profits to themselves and the</p>



	developers. Dacorum is ready to except these proposals through convenience, to satisfy their own obligations to central government, rather than development of the numerous brownfield sites within the borough. By proposing these developments Dacorum are showing a blatant disregard towards the impact of the village and the wider community.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13712
<b>Full Name</b>	Pauline Whitbread
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• This development will loose Wayside Farm which has built up over the last few years selling raw milk + farm shop offering a service to the local community. This will also educate the younger community with regard to sustainability</li> <li>• There is not enough infrastructure road, doctors, hospitals, shop + school</li> <li>• There are already empty office spaces - use those first</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13713
<b>Full Name</b>	Grace Wadsworth
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object in the strongest terms to the proposed sites BOV –h 1,2,3 and 4 in the Dacorum Core Strategy.</p> <p>Specifically I would make the following comments :</p> <ul style="list-style-type: none"> <li>• The proposal conflicts with Central Government’s and Dacorum’s Core Strategy to “minimise impact on Green Belt” and “safeguard the countryside”.</li> <li>• The main ‘B’ road from Hemel to Bovingdon is already the busiest in Hertfordshire and these proposals would see a major increase in traffic which will only add to the existing problems facing</li> </ul>

	<p>the village with regards to parking, road safety and air quality. Significant investment is already required to solve these problems before any housing is built.</p> <ul style="list-style-type: none"> <li>• The current public transport to Hemel and Chesham train stations is woefully inadequate and will mean the increase in private transport to and from the village is set to be in direct ratio to the increase in housing.</li> <li>• There is currently no foot or cycle paths from the village to either Hemel or Chesham station and with the lack of public transport private car will be the only practical way of accessing these facilities.</li> <li>• Community services in the village are already at maximum and these would need to be addressed before any increase in housing.</li> <li>• Currently the village has environmental issues with regard to water abstraction, drainage/sewer system, and localised flooding particularly at the Ryder memorial and Hempstead Road entering the village (near proposed BOV –H4 site). Without significant investment and modernisation increase in housing to the level proposed would have significant impact on quality of life for the existing community.</li> <li>• The proposals would represent a 25% expansion of the village which in itself is likely to cause a significant and unreasonable impact on the quality of life on the existing community made worse by the no plans to improve the existing inadequate infrastructure.</li> <li>• No plans to ensure that the significant revenues generated by the development of these sites returns taxed income to the community to improve the infrastructure. It is already apparent that the land owners are developing these sites through self-owned corporations to minimise 'costs'.</li> </ul> <p>These sites are being proposed and pushed by the land owners seeking to turn Green Belt in to building land and return huge profits to themselves and the developers. Dacorum is ready to except these proposals through convenience, to satisfy their own obligations to central government, rather than development of the numerous brownfield sites within the borough. By proposing these developments Dacorum are showing a blatant disregard towards the impact of the village and the wider community.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13718
<b>Full Name</b>	Trudy Hutchinson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because: There will be no open space left in and around the area and surrounding areas. If green belt is allowed to be built on - its green bely for a reason!!!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13719
<b>Full Name</b>	H Fitkin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because:
<b>Include files</b>	

Number	Question 46
ID	LPIO13720
Full Name	Wendy Costello
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I object to the proposed development on the green belt in and around Kings Langley because: this is an essential part of the area. A working farm and who supply milk and food to locals.
Include files	
Number	Question 46
ID	LPIO13766
Full Name	Edward Hatley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request that you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure nor does it have the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact,</p>

the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-SM-Facsimile.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical

process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the

valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and

- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle



Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from

- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway

station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the

- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities

- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
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- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
  
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision



- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

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- Encroachment of the urban area along the valley bottom and into adjoining open

- Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13817
<b>Full Name</b>	Mr Roger Didham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p>

NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another ant ongoing and planned developments.

BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-Order-for-DBC-SM-Facing-for-a-full-analysis-of-stage-1>). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

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A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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.

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- 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing

- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure

and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.



- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
    - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
  - Continues 'domino effect' of development along the ridge top that DBC was warned about
    - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services

to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities
      - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has

been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to

Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not

viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd

- Situated at ridge top location at a distance from employment, retail, health and community
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River



- Reduction in the degree of separation between the town and Bourne End
  
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
  
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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	<p>person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</p>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13819
<b>Full Name</b>	Gareth Hulse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>it would ruin the character of Kings Langley, as a village - it would become merely part of the ribbon development towards Hemel.</p> <p>Wayside Farm is especially important as a breathing between the M25 and the village.</p> <p>I am concerned at loss of amenity, i.e. walking, on the sites. Local car traffic is already a concern, especially at rush hours - more traffic will pose a safety hazard and a serious challenge for the emergency services.</p> <p>In terms of Dacorum's Local Plan consultation, I favour option 1A, though not to include Shendish (HH-H3).</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13820
<b>Full Name</b>	Mr Charlie Wray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p>

	I have spent the last 37 years of my life farming with my Jersey cows at Wayside Farm and have put a lot of effort into making the farm accessible to and therefore part of the village it would be a great shame if at the stoke of a pen you destroyed this.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13825
<b>Full Name</b>	Valerie Lofty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <p>There will be no green belt left. The infrastructure is incapable of supporting further demands.</p> <p>The roads in the area are lanes, often just with passing places, many slightly larger roads will become 'rat runs'.</p> <p>The overcrowding of the rural area will make everything more dangerous - walking, cycling, horse riding, all normal country/green belt pursuits and if the dairy farm goes, no local milk + milk will have to be imported.</p> <p>The green belt was established for a reason. If there ridiculous plans go ahead the area will become one overcrowded, underfunded urban sprawl. I have lived in this country for 68 years, paid tax since I was 18 + still paying - I do not want to see it destroyed.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13853
<b>Full Name</b>	Mr Derek Lofty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• encroaching on the green belt is totally unacceptable the purpose of the green belt is to keep parts of the country near large towns rural.</li> <li>• If the proposals to build more dwellings is approved Kings Langley will become part of Watford.</li> </ul>

	<ul style="list-style-type: none"> <li>• The infrastructure of the areas is at busting point so further encroachment will be necessart to build schools, shops, hospitals, etc.</li> <li>• The whole character of the countryside surrounding this area will be lost forever.</li> <li>• Anybody voting for this will be guilty og an unforegiveable deed and not acting to support the community.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13872
<b>Full Name</b>	Alex Dann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the ‘Issues &amp; Options’ consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG’s responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response:-</p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn’t have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and ‘insignificant’ negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another ant ongoing and planned developments.</p>

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Argts-Green-Belt-Review-the-DBC-SM-Review.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean

quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types

and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly

rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider



community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there

was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either

massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor

- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow

congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted



	<ul style="list-style-type: none"> <li>• Suggestion of provision of local play space – edge of town not a practical site</li> <li>• Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....</li> <li>• Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town</li> </ul> <ul style="list-style-type: none"> <li>• Site appraisal recommends exclusion from further assessment and retain as green belt</li> <li>• Site lies within CAONB – large-scale development opportunities to be avoided</li> <li>• At a distance from immediate urban edge and would extend town further into countryside</li> <li>• Close to ancient woodland</li> <li>• Loss of leisure facility</li> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage</li> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town</li> </ul> </li> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO13876

<b>Full Name</b>	Mrs Melanie Flowers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because:  The village and surrounding area (inc. Apsley and Nash Mills and Two Waters) has already seen excessive levels of continuing development which means that the infrastructure (particularly traffic) is already overloaded. No future roads can be built for access to M25/M1/A41 and no schools/doctors/hospitals have been proposed. The green belt is important to Kings Langley to maintain the division from surrounding towns and the environmental reasons.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13877
<b>Full Name</b>	Mrs Dawn Sims
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because:  My children and grandchild have a right to the countryside so I object to 1A.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13879
<b>Full Name</b>	Howard Pattinson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I wish to register my objection to the proposed encroachment on a significant area of designated Green Belt land, and in particular to the Wayside Farm envelope which is one of which I have direct knowledge.

	<p>1 The loss of Green Belt Land</p> <p>The local and environmental impact of the loss of this particular area of green belt land cannot be justified. I strongly oppose Dacorum's and Hertfordshire CC's plan to do so and for the following reasons.</p> <p>The character of Kings Langley village is shaped by the green belt oasis provided by Wayside Farm. The farm is an intrinsic part of the village heritage, and prevents it from becoming an urban sprawl.</p> <p>It constitutes one of the unique attractions of Kings Langley, the sight of the Jersey herd in the fields is a much valued, and regrettably rare, gem. The Farm is also the much used gateway to rural access to Chipperfield.</p> <p>Further, it is the livelihood of the tenant farmer and his family. His recent diversification into a farm shop has brought a strong level of support, both locally and far afield, particularly in respect of raw milk sales.</p> <p>The local and environmental resource of Wayside Farm must be protected, and not lost.</p> <p>2 Local traffic impact</p> <p>Currently, at daily peak times there are two significant tail-backs of vehicles attempting to join J20 of the M25 northbound.</p> <p>The first extends back on station road.</p> <p>The second is on the A41 down to the main roundabout before the J20 slip road.</p> <p>The additional traffic emanating from either the proposed commercial or housing development will make the situation both in these specific locations and in Kings Langley village as a whole, untenable. It will also result in increased air pollution levels.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13882
<b>Full Name</b>	Patricia Hardy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing with reference to the above proposed plans, and to register my extreme disagreement with same, for the following reasons.</p> <p>2 Kings Langley has already changed beyond recognition, from idyllic village to an urban sprawl. Industrial estates, office blocks and large housing developments have already done their best to ruin its village atmosphere.</p>

	<p>3 We have 'done our bit' with new housing, filling the Ovaltine and John Dickson sites with hundreds of new homes.</p> <p>4 Infrastructure. Surely it must be obvious that Kings Langley is at saturation point. The queues of traffic going through and around the village, the lack of parking, and the gridlock on the bypass show that we can take no more building of houses, schools and offices in our already sprawling village. Enough is enough.</p> <p>6 We are just hanging on, only just, to village status. The village character is at risk and must not be eroded further. Otherwise, we will just become a huge town sandwiched between Watford and Hemel Hempstead. We residents will not let that happen. Take Note!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13884
<b>Full Name</b>	Patricia Hardy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>2 Kings Langley has already changed beyond recognition, from idyllic village to an urban sprawl. Industrial estates, office blocks and large housing developments have already done their best to ruin its village atmosphere.</p> <p>3 We have 'done our bit' with new housing, filling the Ovaltine and John Dickson sites with hundreds of new homes.</p> <p>4 Infrastructure. Surely it must be obvious that Kings Langley is at saturation point. The queues of traffic going through and around the village, the lack of parking, and the gridlock on the bypass show that we can take no more building of houses, schools and offices in our already sprawling village. Enough is enough.</p> <p>6 We are just hanging on, only just, to village status. The village character is at risk and must not be eroded further. Otherwise, we will just become a huge town sandwiched between Watford and Hemel Hempstead. We residents will not let that happen. Take Note!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13885
<b>Full Name</b>	Patricia Hardy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	5 wayside Farm. I am 90 years old and have lived in Kings Langley for 60 years. I remember the A41, which ran through the village in those days came to a standstill every morning (very few cars of course at that time) when the dairy cows from Wayside Farm wandered across the road to their pasture in the fields opposite. And then back across the road to the farm in the evening. Wayside Farm is entrenched in our village life. It even has a training facility for veterinarians. IT MUST NOT BE TOUCHED.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13886
<b>Full Name</b>	Patricia Hardy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I understand that there are some 2000 brownfield sites in Hemel Hempstead. Let them be used. I also have another suggestion. We are always hearing about how difficult things are 'up north'. With the HS2 now being built (to desecrate our countryside even further), why not allocate a series of new town in those places, complete with schools, industry and new infrastructure. Problem solved!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13888
<b>Full Name</b>	Mrs Jane Attewill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because:  The number of houses planned is over the top especially when you consider other developments planned not only in Hertfordshire but all the Home counties. It will destroy Kings and Abbots Langley + the surrounding farms + countryside for EVER.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13889
<b>Full Name</b>	Mrs Barbara Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because: as an older resident I look back with deep appreciation on the green belt facilities I have enjoyed and benefited from. I strongly feel that following generations have the great right to the same experiences.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13890
<b>Full Name</b>	John and sheila Bailey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because: The High Street in Kings Langley is already extremely congested - the proposed development is dangerous! Further development means: <ul style="list-style-type: none"> <li>• over subscribed schools</li> <li>• over worked GP services</li> <li>• blurring of village boundaries</li> <li>• Loss of village aocial/historic character</li> <li>• Rectory Farm/Wayside Farm/Hill Farm and vital attributes to local life.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13891
<b>Full Name</b>	Mr John James
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <p>eventually , as one of Dacorum's larger villages, it would cease to be a village - it would become an integral part of Hemel Hempstead. I absolutely agree with DBC's Local Plan - see para 4.2.3 'Sustainable development' regarding the promotion of Hemel Hempstead, Berkhamsted and Tring for homes, etc and the conservation of the funtion of, and character of, the villages and countryside. And then, further down in 'Looking after the environment' - the protection and enhancement of Dacorum's landscape..... historic environment. I very much agree with this, particularly with regard to Kings Langley.</p> <p>Para 5.2.6</p> <p>With regard to the 'Role and function of the Green Belt' comment is made about how sustainable developed Green belt areas would be critical in Kings Langley. With highways, at this <u>present time</u>, there is gridlock on the A4251 in the High Street, and in the rush hours long queues on the Watford Road leading to Junction 2a on the M25 - NB, Wayside Farm is on the right hand side!</p> <p>Parking is already a problem and will certainly get worse after completion of the B+M Care development in the High Street and the proposed retirement in the Hempstead Road.</p> <p>Apart from the 'roads' situation, there would be, of course, the question of schools, GP sugeries, water supply, sewage disposal, possible danger of flooding (i.e. Rectory Farm?) etc.</p> <p>In para 10.2.4 'Locational principles are listed (1 to 9). I support 1 (probably none in Kings Langley, 3, 5, 6, 7, 8 and 9 (in appropriate locations).</p> <p>Coming now to para 10.4 and having regard to my comments overleaf and above I am strongly of the opinion that Option 1A should be adopted for Kings Langley.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13895
<b>Full Name</b>	Mrs Ann Kircher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 all the sites proposed to be built on will completely alter the character and identity of the village</li> </ol>

	<p>2 Getting a GP appointment and can Watford and Hemel Hempstead hospitals support all the extra population</p> <p>3 More cars will add to congestion to get to these hospitals, the roads are already gridlocked most times of the day</p> <p>4 Loss of green spaces between Watford / Hemel Hempstead on the A414</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13896
<b>Full Name</b>	J Tidmarsh
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <p>I believe the excessive number of houses proposed will be a detriment to and completely destroy Kings Langley as a village:</p> <ul style="list-style-type: none"> <li>• the loss of valuable farm land</li> <li>• cause traffic chaos, pressure on public services, with no guaranteed strategies in place to alleviate this</li> </ul> <p>However I do recognise there is a need for some development of social/affordable housing preferably on brownfield sites.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13897
<b>Full Name</b>	Mr Peter Kircher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <p>The proposed increase in the number of houses to be built in Kings Langley will further aggravate the already congestion car parking.</p>
<b>Include files</b>	
<b>Number</b>	Question 46



<b>ID</b>	LPIO13898
<b>Full Name</b>	Angela Vaux
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Do not wish anyone to build on green belt! The extra traffic, parking, impact on doctors, the schools, etc will be horrendous!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13900
<b>Full Name</b>	Angela Vaux
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	There are number of offices on the right hand side - Hempstead Road - going to Apsley that have been empty for years?! Can they not be converted into apartments?
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13902
<b>Full Name</b>	Mrs Rosemary Finn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in and around Kings Langley because: all four sites are on green belt + are not brownfield sites, which is my preferred option. <u>Wayside Farm</u> is a thriving local farm, providing a superb farm shop + provides wonderful countryside footpaths for local families. The access to local roads is not viable as it takes 45 mins in the morning to travel 1 mile from Kings Langley village to the M25 (past Wayside Farm) as the traffic is at a standstill.

	<p><u>Hill Farm</u> is a green belt area adjacent to 3 local schools:- is in a highly congested traffic area already</p> <p><u>Shendish</u> is also in green belt + would join up the village of Kings Langley to Hemel Hempstead.</p> <p><u>Rectory Lane</u> - I object to the development for the same reasons as Shendish.</p> <p>All development in this area should <u>not</u> be on green belt + limited to the larger towns of Hemel Hempstead, Tring and Berkhamsted that can provide better transport + infrastructure.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13903
<b>Full Name</b>	Natalie Colauhoun
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in and around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• Lack of infrastructure, over crowded roads/trains</li> <li>• Concern over suitable school spaces</li> <li>• Losing green land and losing the village feel</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13909
<b>Full Name</b>	P Sutcliffe
<b>Company / Organisation</b>	Ramblers Association
<b>Position</b>	Local Footpath Secretary
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are concerned about the effect on Footpaths in respect of two sites identified in the proposed Local Plan up to 2036.</p> <p>Site KL-h3 Land to the west of A41 and Wayside Farm, Watford Road</p> <p>This site is traversed by footpaths KL 5,7 &amp; 8. These are much used footpaths by the locals of Kings Langley and are a strategic link for walkers arriving into Kings Langley by train. Furthermore footpath 5 is the route of the Hertfordshire Way, the Counties long Distant Footpath. The bridge over the A41 onto this site is the only footpath fit to use, all the others involve the highly dangerous M25 roundabout.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13910
<b>Full Name</b>	P Sutcliffe
<b>Company / Organisation</b>	Ramblers Association
<b>Position</b>	Local Footpath Secretary
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are concerned about the effect on Footpaths in respect of two sites identified in the proposed Local Plan up to 2036.</p> <p>Site HH-h3 Lane at Shendish, London Road</p> <p>Footpaths KL 17,18 &amp; 19 are critical footpaths giving access from Chipperfield, Kings Langley and Apsley. They provide an important link giving access from Hemel Hempstead into the Chiltern AONB.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13911
<b>Full Name</b>	Mr Chris Stoneman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are writing in connection with the proposed Local Plan raising objections to the idea of approx. 3000 new houses in Tring.</p> <p>We understand there is even talk of a road from Station Road to Bulbourne which we cannot understand especially in view of the traffic that would be introduced down Marshcroft Lane which has only one lane a present.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13915
<b>Full Name</b>	Mr Chris Stoneman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Our objections regarding the Sites are Tr-h5 at Dunsley Farm, this area is Green Belt – which provides a green corridor into the Town, adjacent to AONB, and would mean a loss of valuable farmland and wildlife which we object to, and as we believe this would also create unsafe road conditions and pollution.
Include files	
Number	Question 46
ID	LPIO13916
Full Name	Mr Chris Stoneman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The other side that concerns us is Grove Road the suggestion is for 1000 new homes which I believe would cause unsafe road conditions, too much strain for both Grove Road near Grove School and Icknield Way.
Include files	
Number	Question 46
ID	LPIO13925
Full Name	David and Katie Hannah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Question 46</b> Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</p> <p>I believe there are numerous issues with the inclusion of Be-H3 in this consultation document and that if the Appraisals had been carried out in the correct manner (see Question 1) then it would not have reached this stage of review. As a summary, the key objections (in addition to those raised in Question 1 would be):</p> <ul style="list-style-type: none"> <li>• <b>Physical unsuitability.</b> The topography of the site (steep hillsides, dry valley) is unchanged since previous DBC Inspectors rejections and make accessibility on foot or by cycle highly impractical if not dangerous:</li> </ul> <p>“Cycling on Gravel Path is hazardous, especially on the ascent and becomes a Level 3+ due to its steep ascent</p>

and subsequent slow speed of cyclists on the narrow carriageway”( HCC 2013 Bikeability Audit Report)

- **Loss of greenbelt.** The Minister of State for Housing and Planning, confirmed in Jun 2016 that:

*Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people (Mr Lewis’s emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.*

In light of this, there can be no justification for taking this productive farmland, which performs a key function as a strong visual and physical link between the Site and the CAONB open countryside to the east. (Inspector in his Report on the Local Plan September 2002) out of the Greenbelt. Other sites are far better placed to actually deliver benefit to the Borough should the tough decision be made to reclassify any Greenbelt. This site will deliver such small housing volume and such high cost and disruption (see Nature of the Final Site below) as to make it wholly unviable.

- **Impact on the CAONB.** Due to access issues to the site, the only viable option would be to significantly develop and upgrade Ivy House Lane to accommodate the vehicular traffic flow that this poorly linked site will require. Such upgrade would produce large scale disruption and cost (for poor housing returns) and produce high levels of visual, light and emission pollution on the CAONB area. It would replace the current hedging with a hard boundary involving a 2 lane highway with pavements and street lighting adjacent to the CAONB. Also, the screening that the developer outlines in their submission would be inadequate given the sloping nature of the sight.
- **Nature of the Final Site.** Despite the developers vision, the reality is that the best that can be expected (due to covenants and local housing patterns) is the provision of c. 40 luxury homes in an isolated and completely car-dependent development. It would be the only site in this area of Berkhamsted that would not have direct access to Gravel Path necessitating longer journeys through either Meadway or the Common and adding significantly do extreme traffic issues in this area currently. Despite the Developers naïve assumption, bus services are too limited to provide any real support and the topography prevents any safe walking or cycling to the Facilities in town – at best 2km+ to the station via steep and currently unpaved roads in places. It would fail to support the required Housing levels needed in the Core Strategy and the only winners by its adoption would be the absentee landowners and distant developers who would make a quick profit on leveraging the local house prices for high-end

	homes whilst giving nothing back to the community and having no interest in solving the longer term issues it would create.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13927
<b>Full Name</b>	Cynthia Longbottom
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In particular I wish to register my strong objection to the proposed development of the field adjacent to Ivy House Lane for the building of 150 houses for the following reasons :-</p> <p>1 It is Green Belt land opposite an Area of Outstanding Natural Beauty.</p> <p>2 Ivy House Lane is a narrow country lane with few passing places and would be extremely difficult to widen in order to cope with the increased traffic resulting from any housing development, let alone construction vehicles in the first place, due to the existing houses on one side and the AONB on the other. At both ends of the lane there are problems of access. A narrow railway bridge at the town end leads into narrow roads, whichever way one turns, which are congested with parked vehicles reducing them to single carriageways. The junction with The Common is a dangerous turning due to the close proximity of the junction with Gravel Path and fast moving traffic from Potten End.</p> <p>3 If the developer pursues the idea of access through Hunters Park, which has been suggested, the junction with Gravel Path has difficult sight lines and is made worse by traffic ignoring the speed limit. (See the report and statistics from the Safe Gravel Path Action group dated 29th May 2017.)</p> <p>4 The field is currently farmed and has been for many years by a local tenant farmer producing valuable cereal crops each year.</p> <p>5 the field has steep slopes and after rainfall the run off collects at the dip and take time to disappear, the amount of run off would be considerably increased with the laying of roads which could potentially flood the valuable farmland on the other side of Ivy House Lane.</p> <p>6 There have been several water leaks in Gravel Path recently and Affinity Water have been reporting in their regular bulletins problems with maintaining supply to the existing houses in the area, an indication that the infrastructure is already showing signs of inadequacy.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO13929
<b>Full Name</b>	C Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Foreword states “it will be vital that the right balance is struck between new development and protecting the character of our towns, villages and countryside which we value so greatly”. This statement is totally applicable to Berkhamsted.</p> <p>This small country town with sites of major historical interest, medieval buildings and a distinctive main street is totally unsuitable for extensive development. The transport infrastructure is unable to cope with the current levels of traffic, exactly the reason a by-pass was built many years ago. Many roads in the town are narrow and already very busy while links to major roads are limited. Parking on many days of the week is insufficient to cater for the current population. On a number of occasions recently there has been no available parking at the railway station with all spaces taken and the legal spaces in the surrounding streets occupied. Bridgewater Road which is now used as a parking over-spill for the station is often at a standstill as traffic tries to navigate the islands, parked cars and speed bumps. It would be impossible for emergency vehicles to use if needed given that the High Street is often at a standstill. In addition to the transport infrastructure the provision of medical, dental and school facilities is already challenged, further development would far exceed the capacity of the town to provide the necessary services. Protecting the character of our town is indeed something we all greatly value.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13932
<b>Full Name</b>	C Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	In the draft Schedule of Site Appraisals I have particular objections to the Be-h3 proposal-Land at Ivy House for the following reasons:

	<ul style="list-style-type: none"> <li>• Loss of Green Belt. Anybody who knows this site has enjoyed the views over wide open countryside to the east of the town. The proposed site and adjacent countryside have been farmed for as long as I can remember and are therefore part of an established land-use in this attractive, rolling countryside.</li> <li>• As detailed in the issues, Ivy House Lane is a narrow, rural track, only one car wide with passing spaces. It is totally inappropriate for the provision of access to the Be-h3 location. Access could be provided through Meadway but this is an un-adopted private road. In the document it is stated that “The promoter also consider an alternative access to be feasible through the adjoining neighbourhood”. I really have no idea how that could be achieved but any access in the adjoining neighbourhood would lead to Gravel Path.</li> <li>• Gravel Path. This road between the town and the Common has been the subject of many traffic reviews over the 34 years we have been living in the area. It is fundamentally dangerous and far too narrow to accommodate even the current levels of traffic. The road downhill from Meadway has a number of tight bends and is narrow. A lorry and a larger car coming in opposite directions can cause a dangerous situation. People using the road as a cut-through drive too fast and this combined with the narrowness and bends has resulted in a number of accidents. Finally the bridge over the railway at the bottom of the hill is a single lane and has a weight restriction. Adding to the traffic on Gravel Path is not a sensible option.</li> <li>• As detailed in the document the site is poorly located in relation to local facilities, especially schools and therefore would require a car (see Access and Gravel Path above). Its valley side location and steep gradients on Ivy House Lane make Cycling and walking a challenge.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13934
<b>Full Name</b>	Charlotte Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I would wish to specifically object to any development on the Dunsley Farm site which is totally unsuitable for additional small and medium sized industrial and warehouse units which would have a damaging effect on the rural green easter entrance to this historic market



	<p>town of Tring and would inevitably increase traffic pollution, car, commercial vehicle and heavy lorry journeys and increase risk to road safety. Surely industrial sites, business parks and warehouse should always be located away from the centre of towns and inner arterial roads?</p> <p>Dunsley Farm is Green Belt land bordered by ANOB. If officers a green corridor entrance to the town and is extremely valuable. It would be sacrilegious to allow any development of any sort on this specific site.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13935
<b>Full Name</b>	Charlotte Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The whole character of Tring would be severely affected by the proposed increases in housing and the town already suffers from poor infrastructure in terms of roads, parking, schools, doctor's surgeries and facilities for disabled residents.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13936
<b>Full Name</b>	Peter Heaney
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the Local Plans recently drawn up for housing development in the area.</p> <p>Tring already suffers from poor infrastructure, the roads (particular the High Road) cannot cope with current traffic levels, parking is difficult, the doctor's surgeries are over stretched and so too are schools. The town does not cater for the needs of disabled people at all.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13937
<b>Full Name</b>	Peter Heaney
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>With particular reference to Question 46 I wish to object to the proposal to develop the site Tr-h5 – Land at Dunsley Farm, London Road. This area is totally unsuitable for development. The green belt land offers a green corridor into the historic market town of Tring. There was a proposal some years ago to develop this land which was overwhelmingly rejected by the local residents – why therefore is it being proposed again?</p> <p>The proposal amounts to ‘urban sprawl’ and would put an unsuitable strain on the local area.</p> <p>Dunsley Farm is also being proposed for small and medium sized industrial units – this would have a devastating effect on the town and would generate an unacceptably high increase in commercial vehicles and heavy lorries in the local area increasing pollution and road traffic safety risk.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13938
<b>Full Name</b>	Peter Heaney
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please ensure that my objection is considered and I hope that the council finds a far more suitable alternative in an area like Hemel Hempstead that could better cope with the challenges.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13939
<b>Full Name</b>	Mrs. Anne Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I write with regard to proposals for the new local plan. There are various sites put forward for development in

	<p>the Berkhamsted area; any increase in housing provision here will create huge problems for Berkhamsted which, already, does not have adequate infrastructure.</p> <p>Relevant important points (in no particular order) include:</p> <p>1 Increase in traffic movements in the high street as new car ownership creates several movements a day.</p> <p>2 Berkhamsted station parking accommodation is already at maximum level, as well as overcrowding on the trains being a problem.</p> <p>3 Increased schooling and medical needs cannot be accommodated.</p> <p>4 The narrow streets in Berkhamsted are already congested and over used for parking purposes which makes traffic movements very difficult and impossible for large vehicles.</p> <p>5 Berkhamsted has reached its target of 600 homes whereas Hemel Hempstead is below target and growth should be concentrated on Hemel Hempstead.</p> <p>6 The development between Hemel Hempstead and Potten End will inevitably bring more traffic into Berkhamsted, even on present plans.</p> <p>7 Too much green belt land is being considered and must not be used at all.</p> <p>Please add this letter to other comments received following the release of the consultation options.</p> <p>P.S. this is not NIMBYSM Berkhamsted cannot cope with more development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13940
<b>Full Name</b>	Timothy Ward
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are well aware of Dacorum's proposals for new build housing in the area.</p> <p>We are also aware of the current proposed development in just Bovingdon village - a prospect that has met with opposition from locals who have voiced concerns that 'why always Bovingdon, yet nothing being built up the road in Chipperfield'?</p> <p>We own 10 acres in Tower Hill, Chipperfield next door to the rows of terraced houses that go between our 10 acres and New Road.</p> <p>If you are seeking alternative/additional possible sites we would be willing vendors.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO13941
<b>Full Name</b>	Charlotte Grange
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a local, young resident, I am writing to express my opposition for the large scale development planned for Kings Langley and my complete dismay at the Council's disregard for the community which they serve.</p> <p>The pressure of four massive developments, covering the precious green belt that we have left, would crush the village and take away what makes it exactly that - a village.</p> <p>I am 20 years old, and due to the constant pressure to build, this area is quickly becoming somewhere I am increasingly looking to get away from.</p> <p>I suffer from depression and anxiety and it has been scientifically proven that having access to open space, that precious green belt, drastically improves our mental health - something I can attest to.</p> <p>The council's plans are a massive threat to that. In a time where the NHS is struggling to cope with demand - particularly with mental health cases - the irony of taking away the public's access to nature is very obvious.</p> <p>I understand that the increased need for accommodation - however, the complete and utter drastic nature of the development would change the face of Kings Langley forever, and make it a soulless and unattractive place to live, and bring up a family. Plus, building on such a large scale - especially the Shendish Manor site - would hugely increase pressure on local schools, roads, and already swamped surgeries.</p> <p>Attempting to book appointments and get through to a doctor, something I need on a regular basis, is already a massive task due to the sheer demand. Increasing the size of Kings Langley is just adding to this problem and causing far more long term infrastructure problems. This plan seeks to 'solve' problems in the short term by building more housing - disregarding the impact on future generations.</p> <p>Large scale developments such as these cannot continue indefinitely.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13942
<b>Full Name</b>	Charlotte Grange
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Thank you for giving us the opportunity to voice the community's concerns. I truly believe you can help sustain the village for the long term, consciously and sustainably.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13944
<b>Full Name</b>	Vivian Watson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>You will be well aware of the concern of all residents of Berkhamsted over the new local plan but we feel we must add our contribution.</p> <p>&gt; It would be very much appreciated if you could have a word in the right ear or bring to the attention of the powers that be that BERKHAMSTED CAN'T TAKE IT.</p> <p>&gt; The thought of adding further housing, and thereby increasing traffic within an already crowded town, is like trying to 'get a quart into a pint pot'. Anyone with the least sense can see that it can't be done. The capacity to increase our population has already reached its finite possibility.</p> <p>&gt; The infrastructure of the town was never designed for its already pressured roads and parking. Let us not allow it to be made worse by developers or well-meaning officials who don't understand the problem.</p> <p>&gt; Most residents you may talk to will have stories to tell about the difficulty getting a doctor's appointment, or finding somewhere to park, and more. All of which are symptoms of a town that is groaning under the burden of the new homes that have been added without consideration of the facilities the town has to offer with its limiting infrastructure.</p> <p>&gt; The Green Belt that has protected our town since 1947, and maintained its historic market town status is under threat either for profit or for badly defined social and political needs. Re-defining Green Belt is nothing less than moving the goal posts and contrary to current government policy.</p> <p>&gt; Berkhamsted has done more towards providing new housing than most of its neighbouring towns and we feel the focus should now be on St Albans or Hemel Hempstead.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13945
<b>Full Name</b>	Mrs Madge Mckinlay
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find below my comment about the proposed Local Plan – Issues and Options – November 2017.</p> <p>Proposed LOCAL PLAN for <b>TRING</b> Area</p> <p>Whilst understanding the principles surrounding the options provided in the draft plan, I find none of the proposals involving development around Tring acceptable.</p> <p>Of the small towns targeted, Tring in particular would suffer a lot in terms of volume and type of traffic, and attendant traffic congestion, both within town and approach roads especially around the Dunsley Farm proposed development.</p> <p>In particular the plan does not recognise the stress that will be put on the infrastructure and essential services eg schooling, public health and primary health care provision.</p> <p>Pressures, already serious, on this small historic town, would become insufferable.</p> <p>The plan as it stands, and its implications, are <b>highly undesirable</b>.</p> <p>They need a thorough re-think.</p> <p><b>I wish to record my strong objection to them.</b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13946
<b>Full Name</b>	Colin Dobson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to inform you that I am strongly opposed to the inclusion of Site Reference Tr-h5 – Land at Dunsley Farm Tring for the following reasons:</p> <ul style="list-style-type: none"> <li>• Green belt – green corridor into town</li> </ul>

	<ul style="list-style-type: none"> <li>• No need for petrol station and supermarket; area has adequate provision</li> <li>• Adjacent to Chiltern AONB</li> <li>• Loss valuable farmland, farm shop and existing rural amenities</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13951
<b>Full Name</b>	Mrs Emma Fallon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The need, type and location should be addressed with a thorough needs analysis. It seems that landowners have put forward suggestions of availability and developers have just decided what they might like to build.</p> <p>Bovingdon sits on clay and therefore is prone to flooding – we would need this to be addressed.</p> <p>The infrastructure in the area does not support the additional families that may well occupy these houses. The junior school is currently full and does not have enough land to build additional classrooms</p> <p>The roads are equally as full and we would need more public transport to support this</p> <p>There is no Senior school provision for the additional building that will take place in the local areas – if you take into account the suggestions for Tring, Berkhamsted and Kings Langley</p> <p>There has been no account of additional houses to be built in Lye Green which will put extra pressure on the roads in and around Bovingdon.</p> <p>The local hospital is not supported by Doctors on site and therefore will not support the needs these additional numbers will place on the local environment.</p> <p>I am deeply concerned by the loss of Greenbelt land where we have brownfield sites available in the vicinity. Once gone it is gone forever and we must protect this green space where we can.</p> <p>The pollution levels will rise, with more people we must consider the pressures this will place our health service under.</p> <p>I would ask that you please consider the above when building the strategic plan to ensure that we are served well before we increase the population in the local area.</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO13952
<b>Full Name</b>	Nigel Hewitt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have been a resident for the last 30 years and a local business owner.</p> <p>Where is the common sense in this plan to build 1,600 new in Berkhamsted.</p> <ol style="list-style-type: none"> <li>1 The roads get grid locked NOW, we cannot take approx. 4,000 more cars!!!</li> <li>2 The town and shops will DIE because there is not enough car parking! We are all lazy and if we get stuck in traffic jams and then cannot find a parking space, we drive to another town or shopping centre!</li> <li>3 The people who draw up and change road junctions have no idea! Just look at the traffic lights at the bottom of Durrants Lane. Cars coming from Tring, wanting to turn right up Durrants Lane, block traffic wanting to go straight on. This is because not enough of the pavement was taken to allow cars to pass on the left! There is plenty of room to have allowed for this, as the verge is very wide there!</li> <li>4 We need more Doctors in the Town, have you tried to get an appointment lately!!!! Just a JOKE!!! More houses, more people, so we need more Doctors BEFORE development.</li> </ol> <p>More Houses, more people means more children. Ever tried to get your child into a local school? We need more schools BEFORE you allow more houses!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13953
<b>Full Name</b>	Nigel Hewitt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have 2 grown up children, how can they get on the property ladder in Berkhamsted? Impossible!!! Where are the starter homes? There are none! Because the developers pay the Council to just build expensive large houses! Absolutely disgusting!</p>



	I hope you take on board my points and I hope common sense prevails. There are plenty of better options than to ruin our beautiful Berkhamsted by just building and building!!!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13956
<b>Full Name</b>	Mr Robert Kedgley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We are writing with concerns and objections to the proposed development of Green Belt land in and around Kings Langley
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13958
<b>Full Name</b>	Mr Robert Kedgley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As it is, Kings Langley in particular struggles already with traffic congestion and oversubscribed schools, doctors, and medical facilities. By adding more houses, cars and people this will just add more of an enormous strain on these already overburdened facilities.</p> <p>Construction on local farms will have a detrimental effect to our well-being, we use these amazing open spaces for our health and mental well-being by being able to walk across these green spaces it gives us all an opportunity to have an ability to breathe in fresh air and enjoy the farm and all that it gives to us as a community as well as a place for animals and wildlife to live and thrive. The dedicated and committed farmer and family would lose their livelihoods and homes as well as our community losing a very respected farm and all that it brings for us in the way of fresh produce and keeping our local businesses thriving.</p> <p>Many extra vehicles in Kings Langley will have a huge negative effect. Some areas at certain times are already gridlocked with some difficulties for the emergency services to get through as traffic can back up all the way from the M25 and also the opposite direction towards Apsley. We cannot see that you can improve road</p>

	<p>services enough to deal with the extra volumes of cars and traffic from not only new residents but their visitors too. The pollution levels would increase drastically and have a knock on effect to our health which then puts more of a strain on the Doctors services that are already stretched.</p> <p>The oversubscribed train links from Kings Langley are at standing room only in the rush hour at the moment and proves impossible to get a car park space there.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13959
<b>Full Name</b>	Mr Robert Kedgley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The proposed site on Love lane is a particularly bad spot as it is so close to the secondary school. The traffic at certain times of the day is an absolute nightmare and the proposed entrance can barely support a dustcart going up and down there let alone extra cars, lorries and construction vehicles. This entrance is on a particularly bad bend on Love Lane which we have seen many a car nearly getting hit coming and going from the entrance. School children cross there at various times of the day and it is gridlocked already in the mornings without another 200 or more cars trying to get out of there at rush hour. This risk will only get greater if the traffic is increased by new houses being built there. The construction impact alone will be disruptive and damaging in many areas. The infrastructure could be greatly damaged during the works with roads having extra wear and tear with the councils barely being able to keep on top of repairs as it is.</p> <p>People cross to and from the common. Dogs have been hit and killed, it will surely be a person next if there is greater traffic.</p> <p>The proposed access runs right past the back of our bedrooms which will be unbearable with traffic coming and going at all times of day and night.</p> <p>This proposed site is also next to listed properties and a conservation area too. The quality of life would be impacted with extra light pollution and pollution in general with a negative and devastating effect on the wildlife on that proposed site.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13960
<b>Full Name</b>	Mr Robert Kedgley
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	With regard to extra cars and traffic in Kings Langley the parking is inadequate and would not cope with more vehicles. There is not the space for extra parking to be made available.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13961
<b>Full Name</b>	Mr Robert Kedgley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We totally disagree with the statement that it is a flat and level site with direct access to the village... It sits on top of a very large hill down to the village and we know first-hand that the site is not flat and level as we have flood water running off the proposed site into our garden and property from the so called flat and level site. Houses built on that land would feel quite disconnected from the area too and anyone who is infirm will struggle to get back up any of the hills.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13962
<b>Full Name</b>	Mr Robert Kedgley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We live in a village of historical importance and by trying to expand it in the ways proposed it will lose its unique and valuable qualities as a village of this standing. It will ultimately not be a village anymore due to the coalescence of other towns. Crime rates will undoubtedly increase and the sense of community will dwindle if the village becomes part of a bigger picture.
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO13963
<b>Full Name</b>	John Bell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a long term resident of Berkhamsted I wish to add my voice to those that recognise that the cumulative impact of development on local Green Belt sites cannot be ignored. Within the town we have a lack of services and facilities unlike Hemel Hempstead and, of course, the town is linear with high sided hills and narrow streets which witness extreme parking issues.</p> <p>The reality appears to be that in the first 10 years of the Core Strategy we have seen development in Berkhamsted at a rate of 34% above the target set - with no infrastructure benefits largely because of the geographical topology of the area. This contrasts with Hemel Hempstead being 21% below target.</p> <p>Already I have friends who no longer travel in from outlying villages to shop in Berkhamsted as the roads are too congested and there is nowhere to park.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13965
<b>Full Name</b>	Dr Philip Rutter
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have read and considered the information made available to residents considering the revision of Dacorum's Local Plan and its potential impact on Kings Langley.</p> <p>I would wish to make the following points:</p> <ul style="list-style-type: none"> <li>• Kings Langley is classified as a village, any significant expansion of its population would take it beyond that definition and permanently alter its character to its detriment.</li> <li>• Currently, Kings Langley is of a size that still allows it to form a single, coherent community where many individuals know each other and that a single community spirit is maintained. Prime examples of the latter would be the two major community</li> </ul>

	<p>events each year (at Christmas on the High Street and the summer (on the hill near the cricket club). This would be destroyed by any significant enlargement of the population.</p> <ul style="list-style-type: none"> <li>• Green belt land surrounding Kings Langley has already been taken during the 1980's for the provision of the M25 viaduct and the A41 bypass. Green belt land is a valuable resource that once lost, will never be regained. It is of benefit in its own right, but also in inhibiting urban sprawl. It would seem that Watford has already diminished the gap towards Abbots Langley by further construction on the Leavesden Aerodrome site.</li> <li>• After the construction of the bypass - the A41 - there was a significant reduction of traffic through Kings Langley village – it was one of the reasons for its constructed. However, in recent years the volume of traffic through the village has risen significantly. In part this is due to traffic from Hemel Hempstead choosing to use it as the main access route to the M25 and the south.</li> <li>• In recent years, with the closure of the Dickinson mills at Kings Langley and Apsley, quite rightly the brown-field land has been reused for both commercial and residential purposes. However, the additional populations at Kings Langley and Apsley have also contributed to the increased traffic passing through Kings Langley. Further, traffic calming measures by Three Rivers Council along Primrose Hill has resulted in many vehicles moving onto the A4251 north of Kings Langley rather than pass along Primrose Hill and join the A4251 at Home Park Mill Link Road. The situation now is that traffic moving south towards the M25 begins to back up to near-standstill through Kings Langley village from 6.30 a.m. until well past 9 a.m. In the evenings traffic heading north begins to back up from about 3.30 p.m. until nearly 7 p.m. It is difficult to see how the A4251 can take further pressure from increased population growth from within the village, or indeed anywhere else that will impact on the A4251. It is perhaps also worth pointing out that there is no diminution of traffic at the weekends. Indeed, the problem is more marked, since it consists of a large number of private vehicles travelling at speeds in excess of 50 mph along Watford Road.</li> </ul> <p>Currently the village benefits significantly by the provision of green belt land in all directions. Many people take full advantage of the many fields and paths for recreation</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13966
<b>Full Name</b>	Dr Philip Rutter
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	It would be lamentable to lose Wayside Farm. As a resident of Kings Langley for just under 40 years, I know how greatly it has been valued. Recently Charlie Wray has taken positive, dynamic steps to make it an even more successful resource.
Include files	
Number	Question 46
ID	LPIO13970
Full Name	Henry McKinlay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The plan may look fine on paper but it is <b>ill-conceived</b> and potentially disastrous.  Tring would suffer greatly in terms of added volume and type of traffic, (commercial, light industrial and shopping), generated by the Dunsley Farm proposal; and there would be added congestion from traffic pouring into the town's narrow streets from Dunsley Farm and around via London Road. London Road as an approach to Tring Town is already a concern.
Include files	
Number	Question 46
ID	LPIO13971
Full Name	Henry McKinlay
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Existing serious pressures on this small historic town, would become insufferable. In particular, the plan does not recognise the stress that will be put on essential services in Tring Town due to a significant increase in population.  The plan as it stands, is this <b>highly undesirable</b> . It needs a thorough re-think.  <b>I wish to convey my FIRM OBJECTION.</b>
Include files	

<b>Number</b>	Question 46
<b>ID</b>	LPIO13976
<b>Full Name</b>	Lady Valerie Corbett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Piccotts End is a conservation village mentioned in the Domesday Book. The areas you refer to HH-h1a, HH-h1b and HH-h2 would surround this area with new homes and thus devalue one of the few historic areas in Dacorum. Piccotts End also has a long-standing flooding problem which would be exacerbated by building on the flood plain.</p> <p>Hemel Hempstead has always been fortunate to be surrounded by green fields which till now were protected by Green Belt legislation. How can the council justify sweeping away this important legislation?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13977
<b>Full Name</b>	Sheila Newland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am writing to add my opinion – and concern- to those of many Berkhamsted residents who are hoping that common sense will eventually prevail with regard to the proposed additional building plan.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO13980
<b>Full Name</b>	Sheila Newland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here	The proposal to build many more expensive houses causing more problems with regard to parking in the town not to mention the infrastructure, doctor's surgeries, schools etc, is, in my humble opinion, absolute madness.
Include files	
Number	Question 46
ID	LPIO13982
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing to you as a concerned resident of Kings Langley, regarding the development proposals contained within your new Local Plan. I am strongly opposed to all of the proposals affecting the village and intend to set out why in this communication.</p> <p>Too many times, Kings Langley has been inadvertently referred to by Council staff as a town. <b>It is not a town. It is a village.</b> Calling it a town, even if inadvertently or as a 'slip of the tongue', only exaggerates the suspicion that the long-term intention of DBC is to merge this village into other large villages, newly formed urban villages and ultimately Hemel Hempstead.</p> <p><b>Kings Langley admittedly, is a large village but a village nonetheless, with a small, popular high street at its centre, a thriving dairy farm at its boundary and a significant Medieval history as its background.</b> Yes it has so-called 'easy' access to major highways (M25, A41 etc) and benefits from being part of the London Midland rail network, but at points of the day, these major roads create havoc on our already struggling infrastructure.</p> <p>The roads in and around the village suffer daily from the traffic travelling from, to and through the village. Quite often we are used as an alternative route when problems arise on the A41 - or even the M25/M1. Many times during the day, you cannot travel from one end of the high street to the other without having to stop to allow another vehicle to pass and this affects public transport too as well as the emergency services. In addition, we have 3x large schools in our village, adding to the pressure at school drop-off and pick-up times, resulting in daily traffic jams and conflict on surrounding roads. <b>Our local infrastructure cannot cope today - and will not be able to cope with an increase of traffic brought about by these proposals.</b></p>



	<p>To nearly double the size of the village is preposterous and a suggestion which surely goes against the National Planning Policy Framework as well as local and national Conservation and Green policies. The proposed Local Plan mentions preservation of rural character, landscape, history and sustainability - yet you are proposing to not only significantly increase the size of our population, but destroy our Green Belt boundary too.</p> <p>It is vital Green Belt land is not built on, particularly with over-ambitious and unnecessary targets, given the current state of Brexit negotiations. Who knows, what our population growth and immigration patterns will be once the separation from Europe has been achieved and impact slowly realised. <b>There is no point, hitting high numbers of housing requirements, way beyond the Government targets, destroying greenfield and Green Belt land in the process - because once taken and destroyed, these pockets of greenery cannot be replaced.</b></p>
Include files	
Number	Question 46
ID	LPIO13983
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Which brings me onto Wayside Farm - a successful, popular, thriving enterprise within our village who go above and beyond to bring so much to our community. Hertfordshire County Council obviously have a financial agenda with proposing the land for sale, but to destroy beautiful greenfield, agricultural and Green Belt land - closing down one of the last dairy farms in the county, for sheer greed and target hitting is abominable. Charlie Wray and family have proved themselves as entrepreneurs time and time again - opening a Farm Shop, selling their Raw Milk and welcoming all the village to the farm at any time. I feel quite strongly that his treatment has been nothing but shocking and the support within the village for him is overwhelming.</p>
Include files	
Number	Question 46
ID	LPIO13984
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The Green Belt is there for a reason - to protect village boundaries and prevent urban sprawl. <b>Your Local Plan not only proposes to develop on our Green Belt boundary but redetermine our village boundary altogether!</b>
Include files	
Number	Question 46
ID	LPIO13985
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	One of Kings Langley's Conservation Areas and Scheduled Ancient Monument, at the top of Langley Hill, is the site of a 13th century Royal Palace. The proposed development at Wayside Farm could see modern-day houses being built in the field next to this and parallel to the Conservation Area. Living in one of the houses overlooking this farmland, and within the Conservation Area, <b>I feel very strongly that this farmland needs to be protected, preserved and deserves our support - not our sentencing.</b> For all the reasons given above, why close a successful enterprise? why destroy valuable green belt land? why blur the lines of village and town, creating more problems for existing residents, for other councils (HCC) or for other agencies (Highways)? and why lose and bury fascinating history, when already so much of our country has been devoured and history lost?
Include files	
Number	Question 46
ID	LPIO13995
Full Name	Mrs Niki Pinchin
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I have no doubt, this email will be one of many, and I'm sure one of many filed and never to be seen again. But I hope, like many, that with enough of us to log our concerns and disgust at the proposals affecting Kings

	Langley, someone somewhere will see sense and stop this preposterous suggestion.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14041
<b>Full Name</b>	Danny Jennings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I would like to register our joint support of the opinions of Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association regarding Dacorum's Local Plan.</b></p> <p>...</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process (see <a href="http://www.nosouthberkhamstedconcept.com/wp-">http://www.nosouthberkhamstedconcept.com/wp-</a></p>

for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm

- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site

appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of



- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case

providing NO 'sustainable Prosperity' to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor

- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective

- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
  - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic

alternative form of transport.  
There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary.
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides.
- Poor relationship to town centre services and facilities, employment land and station.
  
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre.
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space.
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
  - Visually prominent site.
  - Proximity to railway line
  - Impact on setting of the canal

- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town centre
- Important transition area between the town and open countryside.
- New building could set a precedent for further development of land to the A41 bypass.
- Site is too small to offer scope for additional town-wide leisure space.
- Very close to the A41

- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car usage

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of Transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Encroachment of the urban area along the valley bottom and into adjoining open countryside
- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility



	<ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14042
<b>Full Name</b>	JACK ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am aware of the above proposal and I consider the effect of the proposal listed for Tring will have a

	<p>devastating effect on what is a small historic market town in the Chilterns surrounded by the Chiltern Area of Outstanding Natural Beauty in addition to protected Green Belt land.</p> <p>The town is not equipped for any major development and DBC should maintain the Green Belt, as is their obligation, and the character of Tring Town and the surrounding area.</p> <p>Tring already struggles with the lack of hard and social infrastructure e.g. traffic congestion through the narrow roads, lack of car parking in the Town and the railway station, inadequate transport links, schools, doctor's surgeries and the like. How is it going to cope with more major development? how much of this development and the promises of improvement therein can DBC actually directly control and deliver?</p> <p>The proposals are insensitive and reckless adding to urban sprawl in a Town ill equipped to cope.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14043
<b>Full Name</b>	JACK ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	DBC should look at other towns far better equipped and which have been designed and planned to cope with expansion e.g. Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14044
<b>Full Name</b>	JACK ARMSTRONG
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am strongly opposed to the inclusion of site reference Tr-h5 – Land at Dunsley Farm, Tring for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is adjacent to Chiltern Area of Outstanding Natural Beauty</li> <li>• It is Green Belt providing a green corridor / buffer into town</li> </ul>

	<ul style="list-style-type: none"> <li>• It is the gateway site and visual opening to Tring town from the main access of the A41</li> <li>• The site was overwhelmingly rejected for development last time</li> <li>• The development will be unwanted urban sprawl</li> <li>• If the existing petrol filling and Tesco Supermarket are maintained Tring has no need for further</li> <li>• Development of the these fields with their established and mature hedgerow supporting a variety of wildlife will be a tragic loss.</li> <li>• Development can only add further to traffic congestion and pollution making the A41 more akin to a motorway and Cow Lane requiring rebuilding.</li> <li>• No plan are apparent for changes and improvements to the hard and social infrastructure of the Town e.g. schools, doctor's surgeries, buses, car parking, Tring station</li> <li>• It will be another loss of valuable and viable farmland</li> <li>• It will be loss of a designated wildlife site</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14090
<b>Full Name</b>	Mr John Goffey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>In order to avoid duplication, we request that DBC consider this response as supportive of all the points raised by Berkhamsted Residents Action Group (BRAG) in their comprehensive response to the DBC <i>Issues and Options</i> document. We would, in addition, like to add the following points concerning Question 33 of the above document.</b></p> <p>...</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many</p>

of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAGs-objection-to-Green-Belt-Review-for-Dacorum-DBCSM-Facsimile.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in

the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41

- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although

this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading



south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core

Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities
      - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer

months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear

over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass.
  - Site is too small to offer scope for additional town-wide leisure space.
  - Very close to the A41
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community services
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance

- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Encroachment of the urban area along the valley bottom and into adjoining open countryside.
- Distance from the town centre services and facilities, employment land and station.
- Impact on setting of the River Bulbourne.
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site



- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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**Include files**

[BRAG response to Issues Options.pdf](#)

<b>Number</b>	Question 46
<b>ID</b>	LPIO14091
<b>Full Name</b>	Mr & Mrs Storer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>We moved to this village approx. 7 years ago because we wanted to move out of a more 'town like' area to raise our daughter who was then just a baby.</p> <p>We loved the community feel of the village, everyone looking out for each other.</p> <p>We were drawn to the area also for the schools which were a major consideration in our daughters future.</p> <p>The village has become busier and busier since we moved here with the building of offices on the approach road to the station. At peak times both the high street + the A41 bypass are often gridlocked which I feel will only deteriorate if further offices + housing should be built.</p> <p>I also feel that the community spirit will be diluted + the schools will be oversubscribed.</p> <p>Having more people being drawn to the area from outside areas would also increase crime in the area that has already increased significantly since moving here.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14092
<b>Full Name</b>	Mrs Elmira Masters
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I have lived in this village for almost 50 years and cherish the fact that it <u>is</u> a village. We fear that much more housing will link us to Hemel Hempstead (north) and Watford (south), and destroy our distinctiveness.</p> <p>We have our own thriving Good Neighbours' Association and many other organisations catering for our own inhabitants which could not accommodate much larger population.</p>

	The Green Belt was instituted to STOP 'ribbon development' which there proposals would cause.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14138
<b>Full Name</b>	Sue Elleray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</b></p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly"</p>

the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/05/BRAG-Analysis-of-Green-Belt-Review-for-Hemel-Dacorum-2016-17.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the

outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the



grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs –

unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at

- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries

- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides.
- Poor relationship to town centre services and facilities, employment land and station
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major

concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other land.
  - Some distance from the town centre.
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
  - Visually prominent site.
  - Proximity to railway line.
  - Impact on setting of the canal
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space.
  - Very close to the A41
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any

additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Encroachment of the urban area along the valley bottom and into adjoining open countryside
- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town



- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14139
<b>Full Name</b>	Mrs R. E. Wallis
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Green Belt land are the lungs of the country. When green belt is used it can never be returned to its original designation. Environment care is essential.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14141
<b>Full Name</b>	Michael and Wendy Read
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  <ol style="list-style-type: none"> <li>1 Any encroachment into green belt will open the door to unbridled development</li> <li>2 If the proposed changes go ahead it will dramatically change the profile of the <u>VILLAGE</u> and change it into a dormitory <u>TOWN</u>. Kings Langley is a village with a great historical past which will be ruined by over-development.</li> <li>3 The infrastructure i.e.e roads, schools, surgeries cannot cope with the present volume so to increase by over 100% would create chaos.</li> <li>4 To meet the Government demands surely some more brownfield sites could be explored without spoiling our beautiful village and its equally wonderful countryside.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14142
<b>Full Name</b>	Mr R. H. Andrews
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>In view of the current political/economical situation, particularly thinking of Brexit and the future of the U.K, getting rid of any aspect of our food system could be very dangerous.</p> <p>I enjoy my raw milk from the farm and am advised that it is beneficial for my anaemia, but the main argument is the retention of all agricultural land so that we can feed ourselves.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14143
<b>Full Name</b>	Mr John Waters
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>it is vital to present + future lives. All developments should be on 'brownfield sites' and use established utilities.</p> <p>The future is in our hands + we must act to preserve what we have.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14189
<b>Full Name</b>	Mr Richard White
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I disagree with the Dacorum Local Plan proposals for the reasons stated in the BRAG response</b></p> <p>1) Berkhamsted has experienced significant recent housing development &amp; its infrastructure (especially roads and GP surgeries) is already overloaded.</p> <p>2) Further development is constrained by topology; the town is a ribbon development in a steep sided valley.</p>

3) The projected growth figures should be reviewed in the national context. Surely we should have a national strategy that promotes growth outside the London catchment area, coupled with the development of a series of new towns (e.g. along the newly to be reopened Oxford to Cambridge railway corridor). It makes no sense to overdevelop existing towns.

4) Developers will always, understandably, choose to develop the most profitable sites first, which is presumably why Berkhamsted development is ahead of target whilst Hemel Hempstead is behind target. Equally, market forces will only deliver infrastructure improvements on a piecemeal basis associated with each planning approval. So, the local plan needs to be accompanied by a detailed, and fully funded, infrastructure improvement plan.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBC-S14-MF-Comp> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable

location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up area.
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's hall

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition

the gradient between the town centre and the site may make walking and cycling difficult

- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and



then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to

Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car.”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats

including Long Green wildlife site and  
Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider countryside
- New building could set a precedent for further development of land southwards to the A41
- Site is too small to offer scope for additional town-wide leisure space
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about

- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Proximity to Chilterns AONB
- Strong countryside/Green Belt boundary would be breached.
- Impact on valley sides and important dry valley location
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually

- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town

centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside Boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station.
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets"

such as the Grand Union Canal and the River Bulbourne”

- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

- Some distance from the town centre
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41

- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was



very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Encroachment of the urban area along the valley bottom and into adjoining open countryside
- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility

	<ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14191
<b>Full Name</b>	Trudie Lazarus
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:

	<p>There is already saturation point for traffic, schools + all amenities</p> <p>It would destroy the whole character of the area. We have a centre selling <u>proper</u> food (milk especially). The present owners of this business are giving us wonderful produce. Always a queue there. We want this. But money talks. We have the TRUMP syndrome on our doorstep.</p> <p>Expansion will change the whole area for the worse, etc, etc.</p> <p>amenities not sufficient for further development</p> <p>Destruction of a well balanced area</p> <p>Roads already full</p> <p>Destruction of a rural area</p> <p>Destruction of wonderful dairy farm (always queues, wonderful produce, etc)</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14192
<b>Full Name</b>	Trudie Lazarus
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Why not start a new centre further north with houses, factories, etc like the garden towns? including factories, houses, schools, etc, etc. Positive not negative.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14193
<b>Full Name</b>	L Laws
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The Green Belt is essential to our community lives and childrens future. We must safeguard all our 'Green' facilities and their needs. It is a moral principle for our and all of mankinds future. Any building and developments should be on 'brown sites'.</p>

	Our environment, road and public facilities will not stand further usage.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14195
<b>Full Name</b>	Mrs E. J. Keates
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Traffic flow + parked cars clogging roads are already a nightmare. Bet you don't provide enough car parking with these planned houses</p> <p>Getting through the High Street is dicey already. You would make a 'village' into a commuter-sleep-over.</p> <p>Some building but not all you list. I hate the idea that houses will stretch all the way from Nash Mills here - to the bye-pass junction with the M25 - all housing !!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14196
<b>Full Name</b>	Anne Goldsmith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>it is unsustainable with the area. The A4251 going through Kings Langley is congested any time of the day through to Hemel Hempstead and the A41 by pass is queued back everyday after 4pm + in the mornings.</p> <p>Wayside Farm is well used + much loved + also trains vets + these are less than 7 dairy farms left in Herts.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14197
<b>Full Name</b>	Richard Ashuhn
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Building options should first of all be on <u>brown</u> field sites Option 4- is on <u>well used</u> farm land, tenanted by Charlie Wray. This site also includes land where the Royal Palace was sited. People visit the church where the tomb of Edmund of Langley rests.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14198
<b>Full Name</b>	Mr K.J. Haliewood
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: It will destroy the look and feel of a very special area. Decrease bio-diversity, overload and already stretched infrastructure and add to an inexorable march to rob the next generations of the countryside that should be their birthright.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14199
<b>Full Name</b>	Mrs Annushka Scruton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: it will create urban sprawl which will diminish the character of Kings Langley. The majority of Kings Langley residents are proud to live in a village + don't want to loose the village by coalescing with neighbouring settlements.

	<p>Our greenbelt land is a cherished asset bringing social, environmental + economic benefits. The greenbelt land supports important wildlife + biodiversity resources. Please do not jeopardise this whilst there are brownfields sites that can be utilised to achieve the Governments housing targets.</p> <p>Option 1A is the only viable option for local development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14201
<b>Full Name</b>	Mr. Mark Scruton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I am deeply concerned by the plans to develop huge areas around Kings Langley; areas that include large pieces of green belt! I have known kings langley my whole life. It has always had a strong sense of identity and a strong community spirit. The scale of these development will undoubtedly destroy it's village status blurring the boundaries and making it a suburb of Hemel or Watford. It is village of great history &amp; character and this assimilation will be a severally detrimental to the area. The destruction of the green belt land and particularly Wayside Farm will be a huge loss for all &amp; can never be recovered.</p> <p>Along with the emotional and environmental issues with this development plan, there is a very real practical issue with infrastructure. Our roads are already choked and any evident solution seems so costly and impractical that it's hard to believe it can be solved. These issues have to be seriously considered.</p> <p>Option 1A in the council proposals is the only one that seems even half way practical and if a choice HAS to be made this seems the only logical one.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14203
<b>Full Name</b>	Paul Jackson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Wayside Farm brings a little tranquillity and humanity to our increasingly in human concrete and brick jungle.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14204
<b>Full Name</b>	Michael Richards
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I moved to Kings Langley because of the green belt and the proposed development would adversely affect my quality of life in and around Kings Langley. Increased traffic + population would degrade the almost 'rural' feeling that is only just about currently existing. I regularly walk in and around the Wayside Farm. I do not want to see more houses.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14205
<b>Full Name</b>	Mr V. Watts
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Kings Langley is a thriving village separated from Hemel and Watford. Should the development go ahead the towns and villages would become an urban sprawl. Wayside Farm is an important aspect of Kings Langley and should be protected at all costs. I realise that some development is reqd but not on the scale proposed.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14206
<b>Full Name</b>	Mrs Jenny Watts

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Kings Langley is a unique village in Hertfordshire as it has a working farm at it's heart.</p> <p>Wayside Farm is also unique in our area as it successfully produces and sells raw milk. Unfortunately it is on the site that one of the proposals for a massive housing development is planned. If this goes ahead we will loose Wayside Farm and the freedom to buy raw milk locally.</p> <p>Kings Langley is a successful community village with housing, shops, schools, arts + craft groups and a drama group. But we are very proud of Wayside Farm and do not wish to loose it.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14207
<b>Full Name</b>	H. C. Portunin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p><u>" GREEN BELT"</u></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14208
<b>Full Name</b>	Janet Gilpin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p>



	<p>I moved here because I wanted to live in a village! The additional housing you are proposing will destroy the character of the village, put more strain on village roads which are already congested and increase pollution.</p> <p>We need to maintain green belt around us for our health and well-being</p> <p>Do not let our village be swallowed up by Hemel and Watford.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14209
<b>Full Name</b>	Mr Andrew Purvis
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The green belt was there for a good reason, and protected for future generation's, so what is the point if Council's are allowed to build anywhere they like. We may need more house's but house's that will be that expensive in an area like that, will not be what you could call affordable.</p> <p>In Croxley two school's have been knocked down to build house's, now the Council have said we don't have enough schools, so they are building one on green belt. Do these Councils ever think before they do things (a bit suspicious don't you think)</p> <p>NO</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14210
<b>Full Name</b>	Miss D Quelch
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Having lived in Kings Langley all my life I feel the green space is important to all generations. Obviously we need more housing, but there has got to be a way to ensure</p>

	<p>this is as much for local people, whilst retaining the village.</p> <p>My worry is the lack of schools, road space and parking. This has to be addressed prior to any decisions being made. It would be so sad to see Kings Langley disappear into the suburbs of Hemel or Watford.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14211
<b>Full Name</b>	Mr G Seel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>There is already too much traffic and to add more to Kings Langley will make it almost impossible to leave Chipperfield. Already takes 40 mins to get to Watford !!!!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14212
<b>Full Name</b>	M. P. Barrow
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>This lovely village will be completely destroyed, with congested streets, not enough (<i>can't read word</i>) and a shortage of doctors, dentists and schools.</p> <p>Our roads can't deal with more traffic and more shops needed with shortages of clothes shops, fish shops, etc.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14213
<b>Full Name</b>	Mr Bob Davies
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Impact on village character.</p> <p>The urban sprawl joining Kings Langley to Watford + Hemel.</p> <p>Non sustainability of infrastructure i.e. roads, hospitals + schools.</p> <p>The loss of one of ONLY 2 dairy farms in Herts. NO EVIDENCE for the NEED of housing in area.</p> <p>DEFINITELY no need for more office blocks.</p> <p>KEEP KINGS LANGLEY A VILLAGE!!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14214
<b>Full Name</b>	Glenda Seal
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p><u>Hill Side Farm</u>: no suitable or safe road access for the proposed 280 houses.</p> <p><u>Rectory Farm</u>: Part flood plain. No suitable access except on to A4251 which is already congested. 200 houses? That is 10 houses per acre. Mike rabbit hutches.</p> <p><u>Shendish</u>: New road bridge needed as single road bridge not suitable.</p> <p><u>Wayside</u>: Working Jersey cow farm. Access restricted for 2,000 houses. Impact on Kings Langley and M25.</p> <p>Green Belt is there to stop urban sprawl. Anyone who has ever argued that a planning application on an existing garage and was refused because it is deemed Green Belt should be SO ANGRY !!!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14215
<b>Full Name</b>	Arthur Jepsen
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on Green Belt in around Kings Langley because:</p> <p>I am concerned about the future of Kings Langley as a village.</p> <p>Options 2 + 3 would infill the area so much that we would almost be a suburb of Hemel Hempstead.</p> <p>The whole ethos of Kings Langley being a village would be totally ruined while better options are available.</p> <p>I am also concerned about the traffic increase which will inevitably result from the proposed developments.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14221
<b>Full Name</b>	Mr C. J. Nutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Building all the proposed houses on Green belt land will destroy the character of Kings Langley</li> <li>2 The A4126 cannot take any more lorries (<i>can't read text</i>). It can take half-an-hour to get from the church to M25 roundabout.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14222
<b>Full Name</b>	N. Hijaz
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>the infrastructure is inefficient in its current form and obviously incapable of coping with more traffic and an</p>

	increase to population, not to mention the crushing effect it would have on civil services - i.e. GPs, school places, etc.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14223
<b>Full Name</b>	Mrs Viv Nutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• Primarily it is Green Belt - what a tragic legacy to concrete Kings Langley. Building on Brown sites is acceptable especially for starter homes for local off spring + smaller properties for people wishing to down size</li> <li>• Traffic at the moment is often very congested - further traffic would just add to the problem</li> <li>• Kings Langley is a VILLAGE. Over last 20 years it has expanded exponentially. Development on Green Belt would threaten our village status leaving urban sprawl</li> <li>• Local services would be seriously considerably unable to cope</li> <li>• Building on Green Belt would seriously threaten what is so precious</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14224
<b>Full Name</b>	Georgina Elizabeth Nutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• Not enough space for houses at Wayside - not enough infrastructure</li> <li>• It would ruin the entrance to the village status - too much traffic, too many people</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO14225
<b>Full Name</b>	Mrs L. Jepsen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Kings Langley is an historic <u>village</u> dating back to 1276 when it had a Royal Palace. In addition, Edmund de Langley's tomb lies at the Parish Church of All Saints.</p> <p>The whole ethos of the village would be lost if we accept Local Plan 2, 3, B and C.</p> <p>I realise we need houses put in order to keep Kings Langley's historic identity</p> <p>I hope we can have Option 1A.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14232
<b>Full Name</b>	Mrs M. G. Bywater
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Our roads are already congested, air quality will be bad with more cars etc.</p> <p>Access to hospitals will be impossible, our doctors, hospitals + schools are very busy now and will not cope, for everyone's benefit we need to keep our green belt green.</p> <p>The development of the numbers proposed is <u>NOT</u> an option for reasons overleaf</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14234
<b>Full Name</b>	M. Ather
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The 'village' is now becoming very congested.</p> <p>We have 3 schools close together all causing huge traffic problems in KL.</p> <p>Parking on small lanes not fit for purpose. Parking is already almost non-existent for shopping.</p> <p>Main roads virtually impossible to the one at certain times of the day.</p> <p>The obvious stress on surgeries which further development would cause.</p> <p>We have a farm which is used to provide milk etc - not to be used for houses.</p> <p><u>NO BUILDING on the GREEN BELT</u></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14236
<b>Full Name</b>	Mr + Mrs E. Phillips
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Traffic chaos if all these houses to be build.</p> <p>What about the doctors surgeries are more to be built.</p> <p>To build all these proposed building on green belt when there is brown belt available. It will ruin Kings Langley beautiful heritage with all these proposed sites.</p> <p>A farm site has become famous for raw milk and farm shop, etc</p> <p>Schools will be affected as well.</p> <p>We may be retired and older but we still care about <u>KINGS LANGLEY</u></p> <p><u>No to be building on green belt</u></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14238
<b>Full Name</b>	Mr Keith Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 Urban areas require a breathing space</li> <li>2 Kings Langley's infrastructure is already over loaded</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14239
<b>Full Name</b>	Janet Fanshawe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 The Green Belt should be protected and in the case of Kings Langley this is essential in order to avoid coalescence with neighbouring communities.</li> <li>2 Affordable housing in the context of house prices in Kings Langley would exclude most of the young people/families who must need this in our area.</li> <li>3 There would be serious infrastructure problems with roads, schools and health facilities particularly affected.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14241
<b>Full Name</b>	Mr Christopher McShane
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <p>The proposals to over develop land in and around Kings Langley including Wayside Farm will inevitably alter the character of what is currently a village, FOREVER</p> <p>Common sense dictates that the A4251 between Hemel + the M25, even now, is barely adequate to</p>



	<p>accommodate the current flow of vehicular traffic widening this route or building new roads to allow for additional house building is patently unworkable.</p> <p>The UK is haemorrhaging GP + teachers positions. The vacancies are at an all time high.</p> <p>If you believe that building schools/surgeries to cater for the inevitably increased population is foolhardy solution.</p> <p>Build on existing brownfield sites in Watford, Hemel + St Albans</p> <p>Allow Kings Langley to retain its status as a village</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14243
<b>Full Name</b>	Mrs A Banister
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• The local schools, doctors, dentists are full.</li> <li>• The Local hospital closed. with even more potential patients it will be impossible to cope.</li> <li>• Parking is already an issue.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14245
<b>Full Name</b>	Douglas Amarker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on Green Belt in around Kings Langley because:</p> <p>I have lived in and around Kings Langley for over 40 years and think it is a lovely place to live. With all its conveniences in and around it.</p> <p>It will be a <i>shame (can't read word)</i> to see the farmland now have development to go ahead. The traffic would be in (<i>can't read word</i>) and its village could not cope, not in my life time.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14246
<b>Full Name</b>	Thomas Kellond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Our village and around Shendish do not need a new housing development.</p> <p>We have moved from London recently to enjoy the quiet and beautiful resident.</p> <p>It needs to remain as it is and to be protected.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14247
<b>Full Name</b>	Hilary Watker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p><u>SAVE OUR FARM</u></p> <p>I am very disappointed that this proposal is even being considered given the traffic already in the village high street and feel it would turn our beautiful village into a mini town but without the extra amenities that would be needed.</p> <p>It would be better to build a whole new village - wild open spaces that would not affect so many people.</p> <p>Please help this community</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14249
<b>Full Name</b>	Mr Gerald Darvill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The scale of development in this area would be totally unsustainable.</p> <p>The access roads to any of these sites would be very restricted. Even the surrounding 'main' roads could never cope with the vehicular increase, which would be many hundreds, probably thousands of cars plus all the extra service vehicles.</p> <p>Additionally car parking in and around Kings Langley is totally inadequate. Cars and vans are frequently parked obstructing both roads and pavements.</p> <p>Hempstead Road and the high street are gridlocked almost daily sometimes from the M25 through Kings Langley to Two Waters. Also Nash Mills Lane is also blocked through Lower Road + Belswains Lane as far as Barnacres + beyond. There aren't enough doctor's surgeries or schools.</p> <p>We have limited green areas and the character of the village would be ruined by over-development, joining with Watford and Hemel Hempstead.</p> <p>There are numerous other reasons. I suggest option 1A is the only logical choice!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14251
<b>Full Name</b>	Mrs O. Darvill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green belt in around Kings Langley because:</p> <p>The road through the village is <u>already</u> unsuitable for the constant flow of traffic from the motorway, surrounding villages and beyond.</p> <p>Dangerous for public who need safe access to surgeries (GPs already over-worked), schools (already over subscribed) and other amenities in the village.</p> <p>Parking totally inadequate.</p> <p>Village boundaries would merge, losing historic character, identity and village social life.</p> <p>Loss of precious wildlife and beautiful, valued landscapes.</p> <p>We greatly value all our local farms and would highlight Wayside Farm which is only 1 of 2 in the <u>County</u> who have a Jersey herd.</p>

	I support option 1A only as any other options would be totally unsustainable
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14253
<b>Full Name</b>	Karen Watker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Having lived in Kings Langley for most of my life, I have seen many changes to the area but none as bad as the proposed new housing.</p> <p>Developments on green belt land, Kings Langley is struggling with the population it already has let alone the traffic problems through the village itself.</p> <p>How will the schools, doctors and roads cope with more housing in the village area?</p> <p>(NOT a happy Karen Watker)</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14254
<b>Full Name</b>	Mr Richard Kellond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Shendish HH-H3 - flood risk indicated neutral is incomprehensible. If it rains for a few days, a small stream run down woodland side of Rucklers Lane. Removing soil and cutting the trees, replace it with concrete for the foundation will lose vital soak away and upset the water table, hence risk of flooding will increase in Rucklers Lane</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14256
<b>Full Name</b>	Mr Frank Kellond

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It is easy to make an appointment with the GP in the village at the moment. I truly appreciate this, but I feel this will be impossible in future with the new housing development.</p> <p>Until recently, I have lived in London all my life, past 20 years it has become overcrowded and impossible place to live.</p> <p>Long waiting list at the local hospitals and GP were one of the main reasons why we had moved away to Kings Langley.</p> <p>I would like to make sure it won't happen again in Kings Langley and Shendish area</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14257
<b>Full Name</b>	Hiromi Kellond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I am concerns about damage to the woodland and wildlife around Shendish HH-H3</p> <p>I love and respect wildlife that it needs to be protected.</p> <p>New housing development will damage to the woodland and its habitat.</p> <p>I love the beautiful view of the woodland and my garden is just like a mini nature reserve, birds and animals visit me daily all year around.</p> <p>I must keep them and protect them as they are.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14258
<b>Full Name</b>	Jo Hancock
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It will change the character of the village</p> <p>Kings Langley will merge into either Watford or Hemel Hempstead.</p> <p>The livelihood of one of the last few Jersey cow farmers will be taken away. Why are offices proposed to be built on Wayside Farm when the office units on Home Park where unable to be rented and are now been turned into flats.</p> <p>Watford General Hospital Local doctor surgeries and schools will be unable to cope with the increase of over 3,000 + people.</p> <p>Kings Langley high street would be unable to cope with increase volume of traffic.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14259
<b>Full Name</b>	L. Burrough
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Loss of amenity of Wayside Farm which offers one of only 2 Jersey milk herds in the country, a new farm shop and raw milk</li> <li>2 Numerous countryside footpaths, open landscapes and woodland would be lost</li> <li>3 Development at Wayside Farm (up to 2,000 houses) would lead to coalescence of building with Kings Langley becoming a virtual suburb of Watford</li> <li>4 4 sites in Kings Langley would fundamentally change the village to a dormitory town</li> <li>5 Levels of traffic onto and off the M25 through the village are already huge with peak time jams</li> <li>6 Option 1A is the only viable option</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14261
<b>Full Name</b>	Oliver Burrough

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: It would completely ruin the atmosphere of the village The new houses would also experience loud noise pollution (in Wayside Farm) from the A41 and M25 Extra people would add congestion to our roads and public transport as too expensive for many Option 1A only
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14263
<b>Full Name</b>	Mrs Beryl Irvine
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposal development on the green belt in around Kings Langley because: It will change the ethos of the village, congestion will be unbearable for everyone. We want Kings Langley to be a village and not joined onto Hemel Hempstead. Beautiful green belt countryside will be ruined.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14264
<b>Full Name</b>	Ian Turner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: The population of Kings Langley is 5,078. This proposal will double this at the moment.

	<p>This infrastructure in the village is poor. Not enough public transport, roads always buzzy</p> <p>Hospital in area are poor only Watford A&amp;E. Last time I went it was 4 1/2 hours before being treated.</p> <p>Doctors last appointment had to wait a week.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14265
<b>Full Name</b>	Mr Andrew Chaunkour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>the local infrastructure will not be able to cope with the number of people</p> <p>Roads are crowded and schools over-subscribed already</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14266
<b>Full Name</b>	Judith E Ashford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>NO</p> <ol style="list-style-type: none"> <li>1 This would turn the village into a town - merging eventually into Hemel Hempstead or Watford</li> <li>2 The traffic is grid locked through the village as it is</li> <li>3 Why are green belt areas being used?</li> <li>4 Destroy the village life as it is now</li> <li>5 Do not have sufficient schools, doctors, etc as it is</li> <li>6 Greater strain on services: water, electricity, conditions of roads (road surfacing, drain clearing is not done now)</li> </ol> <p>NO</p>
<b>Include files</b>	



<b>Number</b>	Question 46
<b>ID</b>	LPIO14268
<b>Full Name</b>	Mr Peter Flowers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in around Kings Langley because:</p> <p>The infrastructure in and around the village cannot cope with any further development.</p> <p>As a resident I already struggle to get to and from work around rush hour and the schools and healthcare systems do not appear to be able to cope with an influx of more people.</p> <p>Finally, the character of the village would be spoilt forever.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14269
<b>Full Name</b>	M. H. Bullock
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It would:</p> <ol style="list-style-type: none"> <li>1 Result in urban sprawl and in neighbouring towns/villages merging into one another</li> <li>2 Damage the setting and special character of the historic area</li> <li>3 reduce areas of recreation</li> <li>4 have an adverse effect on air quality which trees/countryside help improve</li> <li>5 Have a devastating effect on wild animals habitats and reduce biodiversity</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14270
<b>Full Name</b>	S. M. Bullock
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in around Kings Langley because: It will lead to already severe traffic congestion becoming much worse and in turn to additional air pollution There will be extra pressure on already over stretched schools, doctors and other services
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14271
<b>Full Name</b>	Haled Abu Qalbain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: We have milk and where you going to put the cows? You cannot kill them. I like cows land forests
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14272
<b>Full Name</b>	Omar Abu-Qalbain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the green belt in around Kings Langley because: I regularly visit Wayside Farm for raw milk. It would devastate my family and I if the farm was to close.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14273

<b>Full Name</b>	Edith Jackson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in around Kings Langley because:</p> <p>this village has royal connections via Edmund de Langler. The remains of the Royal Palace and the monastery still remain. During the plague Parliament rules the country from Kings Langley</p> <p>By building so many houses will take away the origins of history unique to this village</p> <p>I object quite strongly - lived here since 1941</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14274
<b>Full Name</b>	Mr Jonathan Checkley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in around Kings Langley because:</p> <p>The green belt around London has served us well over the past 70 years or so.</p> <p>For the villages in Dacorum it has stopped coalescence into one urban sprawl which is so important to the whole area and everyone living in it</p> <p><u>We must not loose our green belt - any of it!</u></p> <p>All our employment buildings have been turned into housing. Now you want to turn Wayside Farm into an industrial estate - <u>it makes no sense</u></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14276
<b>Full Name</b>	Mr Stephen Moore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The designation of Wayside Farm is totally inappropriate as the farmer would loose his livelihood.</p> <p>The farm has only one of two Jersey herds in the country</p> <p>Any further development in the Kings Langley area as the roads are already heavily congested would be inappropriate.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14277
<b>Full Name</b>	Susan O'Sullivan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• The impact on roads, etc as there does not seem to be enough space for traffic now</li> <li>• Green space is needed for health + well being</li> <li>• It would not be a village</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14278
<b>Full Name</b>	D. Heineison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the green belt in around Kings Langley because:</p> <p>We need green spaces for health + well being for people + wildlife.</p> <ul style="list-style-type: none"> <li>• infrastructure is not in place for an increase in population</li> <li>• Keep Hemel + Kings Langley village separate identity.</li> </ul>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14279
<b>Full Name</b>	Mr Carl Howey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• Kings Langley will lose its identity as a village as it will be coalesced into Hemel Hempstead</li> <li>• Traffic is already at overload through the village along the A4251 into and out of Apsley and these developments will only exacerbate this</li> <li>• The loss of Wayside Farm will be huge to the community who buy its produce.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14280
<b>Full Name</b>	Louise Eykelbosch-Howey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• it will cause the coalescence of Hemel Hempstead and Kings Langley</li> <li>• The local infrastructure is already at breaking point so it cannot sustain any more vehicles</li> <li>• Wayside Farm is an asset to the village which provides local produce to the community</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14281
<b>Full Name</b>	Mrs Pamela Wells
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Kings Langley is a village with an important historical interest, the site of the palace garden mentioned in Shakespeare's Richard 2.</p> <p>Wayside Farm has been made into a viable dairy farm with the shop and raw milk is an asset to the children of the village to see animals + tractors.</p> <p>Shendish development would join us to Hemel and create enormous traffic problems</p> <p>Hill Farm also for Chipperfield Road and 3 schools</p> <p>Rectory Farm with the TIK vegetables that we enjoy would make a site for a small number of council or low cost housing for young people who leave to move away to Hemel or Luton at present.</p> <p>The nursing home being built on Langley Hill will make parking in the village hopeless</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14283
<b>Full Name</b>	P.R. Gray
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>There is more than enough brown-field sites, vacant properties and unused office space throughout Dacorum Borough to fulfil the Govt's requirements</p> <p>I prefer Option 1A</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14337
<b>Full Name</b>	Ms Vicky Tattle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG</p>

response, I request you accept this as do confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.

Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-Green-Belt-Review-for-DBC-St-Alban's-Expansion.pdf>

for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for

removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within



Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canal side environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of

the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions

- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of

Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a

junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site.



We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated

- Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- 
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in

	<p>Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</p> <ul style="list-style-type: none"> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14339
<b>Full Name</b>	Martyn Weston
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It will destroy the historic village of Kings Langley and make it a suburb of Hemel Hempstead at one end of the village and Watford at the other, destroying the identity of this historically important village</p>

	Kings Langley does not have the infrastructure to cope with any more building, especially on this scale.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14340
<b>Full Name</b>	Mrs J M Sparks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Berkhamsted is a historic market town in Hertfordshire. After visiting your recent planning exhibition at the Civic Centre, it seems you are determined to allow opportunistic developers to destroy our town for future generations.</p> <p>The town is already jammed with cars and parking is virtually impossible. To add further houses as your plan outlines would add 4000 more cars. The roads are not big enough. The main road through town cannot be sufficiently widened. The narrow streets off the main road are already jammed with double parked cars. Your plan for extra houses will grid-lock the whole of Berkhamsted.</p> <p>The current bus routes already have difficulty in navigating the parked cars in streets, and the time taken to travel has increased due to traffic congestion. The extra traffic caused by your plan will severely impact on bus routes and bus journey times.</p> <p>It generally takes about 20 minutes to drive a 750 yard stretch through the town due to congestion. Berkhamsted is a steep sided valley town with, therefore, a lot of hills. The buses don't serve where I live, therefore, public transport is not an option for me and many in the town to go shopping (a 2-3 mile round trip).</p> <p>Extra traffic due to over building of houses will create chaos. The existing density of housing already causes this amount of traffic on roads which were never constructed to take the present volume of traffic. Your plan fails to address the massive increase in resulting traffic on these roads – 4000 additional cars. Current housing prevents widening or new road building. Your plan ignores this and there is no attempt to address the problems caused.</p> <p>Currently waiting time for a doctor's appointment is 7-10 days. Add the extra households you are planning and a doctor's appointment will become impossible in under a month. This is totally unacceptable to the sick and elderly. To get a dentist's appointment takes up to a month – and then you have to pay for a private appointment. If the new housing plan goes ahead an appointment to see a dentist will escalate to 3 months – and as likely as not their fees will increase.</p>

	<p>The current plan has seen 628 houses built with a further 600 already planned. Even with this increase the current primary and secondary school places required will struggle to meet demand. Your plan for even more households will cause the education system to fail as it will be unable to meet the demand. What impact will this have on our children in Berkhamsted?</p> <p>There are unrealistic assumptions in the proposed DBC plan. Mental Health and culture seems to be have been ignored. There is no guarantee of funding to provide the requirements. DBC assumes that others will provide the additional funding for buildings and staffing. It also fails to address the land and location of such needs.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14347
<b>Full Name</b>	Ms Alison Cockerill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to oppose, the strongest terms, any development on land at the eastern approaches to Tring, namely Dunsley Farm ref Tr-h5. In 2009 along with the rest of Tring I voted for town growth to be at the western end of Tring, even though I live in that area and will obviously be affected. This development LA5 has now been approved, for home and industrial use.</p> <p>There is no justification to consider Dunsley Farm, the area is Green Belt, good farmland which this country will increasingly need, and next to an AONB. There is ample space for industrial units on the Icknield Way site, and if another petrol station is needed (which is doubtful) it should be at the opposite end of the town to the existing one.</p> <p>Additional housing in Tring on this scale is not sustainable. The current residents are already suffering the effects of poor infrastructure, not enough doctors, only one crowded secondary school, parking problems and a struggling high street. Another edge of town supermarket is the last thing Tring needs.</p> <p>Tring is currently being overwhelmed by proposals for completely unsuitable development, which will be of enormous financial benefit to the major building companies who construct the houses, and of total detriment to the town. I sincerely hope Dacorum Borough Council will reject these plans and instead look at ways to support a small market town struggling to keep it's identity.</p> <p>I trust Dacorum Borough Council will honour the result of the original referendum held in 2009 and completely</p>

	dismiss any plans for growth at the eastern approach to Tring.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14366
<b>Full Name</b>	Mr & Mrs Gillian & Peter McDonnell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My wife and I moved to Kings Langley approximately 23 years ago to obtain a better quality of life, leaving behind the urban sprawl of London. When we move into our house we felt we were living in paradise, fresh air, green fields, footpath walks etc.</p> <p>When we moved to the village the Ovaltine factory, Sappi Mills, Dickinson Paper mills and Kodak were all functional enterprises employing many local people. Gradually over the years, one by one, these sites have ceased production and have since been developed into high density housing sites, resulting in a dramatic number of people, and cars using the facilities of the "village" i.e. hospital services, doctors surgeries, schools and transport putting an enormous strain on our local services. Dacorum Borough Council are now proposing to build four more high density developments to add to the already densely populated village. You are destroying the Parish and we no longer feel we live in a village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14367
<b>Full Name</b>	Mr & Mrs Gillian & Peter McDonnell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>If we need these areas of development there are numerous brown field sites in the village that could be re-developed for social housing, i.e. The Skyline Roofing building in The Nap, the industrial site at the bottom of Church Lane including the car sales site, carpet warehouse etc. This area would be ideal for social housing and thus, alleviating the need to build on Green Field sites by moving the above companies to the Maylands Industrial site in Hemel Hempstead. The lower</p>



	road in Kings Langley also has the potential to be re-developed for housing.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14368
<b>Full Name</b>	Mr & Mrs Gillian & Peter McDonnell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I must commend the Planning Department in building these past developments on brown field sites, which we support 100%. Your recent consultation on the proposed development of these four proposed green field sites is one step too far – one which is Charlie Wray’s farm (Wayside Farm) growing arable crops and a dairy farm. This farmer is a valued member of our Parish – he encourages people to use his well maintained footpaths across the farm which is an absolute joy to use in getting away from the traffic noise etc. With the ever increasing population these farms are essential for feeding people for future generations.</p> <p>We are ratepayers and feel we need to be consulted on your proposals – the decision you propose to make will destroy the quality of life in the village – we need more green sites for recreation – not less, also helping to eliminate global warming.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14369
<b>Full Name</b>	Kerry Turnock
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to register my objection to any development of the Green Belt around Bovingdon.</p> <p>The current infrastructure is already overloaded. The High Street is constantly jammed with traffic and parking. The traffic queues up on the main road down to Hemel Hempstead and our Doctors and Dentists are already full.</p> <p>The village is surrounded by beautiful countryside that has been preserved for hundreds of years. Now is not the time to ruin it! New houses will not provide homes</p>

	<p>for local residents, just bring commuters from outside the local area, putting a huge strain on our community.</p> <p>As I said, I do not agree with any further large scale development of Bovingdon. However if it has to be done, it must be a development that can be accessed by the main and only A road in and out of our village. No development should be authorised in Green Lane as the junction at High Street is a nightmare, which very limited vision, and numerous accidents each year.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14370
<b>Full Name</b>	Peter Hall
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The infrastructure in Bovingdon is already being used at, or in excess of, full capacity:</p> <p><u>Education</u></p> <p>The village school is operating at full capacity, has few if any places available for new students, and is not able to expand its capacity on its present site. Were the school to be moved to the outskirts of the village, possibly onto green belt land, that would force many students to be driven to school instead of walking as at present. As a result of those changes, the school would cease to occupy a central place in the village life and its activities.</p> <p><u>Bovingdon High Street Traffic</u></p> <p>Bovingdon High Street is already forced to operate at way above its sensible traffic capacity. As a result, there are often queues of vehicles trying to get through the village. This is not only frustrating for drivers, it is also potentially dangerous for pedestrians who wish to cross the High Street.</p> <p>Any expansion in Bovingdon will only make this bad situation even worse, because there is no obvious way to mitigate this severe problem.</p> <p><u>Proposed Sites for Building</u></p> <p>I understand that all the sites proposed are in the green belt and have been proposed on an opportunistic basis by their present owners who wish to benefit from the proposed plans proceeding.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14372
<b>Full Name</b>	Peter Hall
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Would it not be preferable to keep these green belt sites as green belt and to consider brownfield sites or even Bovingdon aerodrome?
Include files	
Number	Question 46
ID	LPIO14418
Full Name	Ray Tattle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p>

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Argts-Green-Belt-Review-the-DBC-SM-Review.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean

quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types

and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection



had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution

- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision

- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer

months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community

- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area



- Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14467
<b>Full Name</b>	Giselle Okin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial</p>

review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-Green-Belt-Review-Under-DBC-SM-Facing-for-a-full-analysis-of-stage-1>). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

**Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

**Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

**Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure

sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees

(including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices



- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for

and any other proposed development along Shootersway.

- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles

down the valley at Westbrook Hay and other strategic vantage points

- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and,

during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
  
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated.

Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns

- Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- 
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the

	<p>town centre facilities and services - residents won't be walking and cycling to the town</p> <ul style="list-style-type: none"> <li>• Site appraisal recommends exclusion from further assessment and retain as green belt</li> <li>• Site lies within CAONB – large-scale development opportunities to be avoided</li> <li>• At a distance from immediate urban edge and would extend town further into countryside</li> <li>• Close to ancient woodland</li> <li>• Loss of leisure facility <ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14469



<b>Full Name</b>	Giselle Okin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>I believe the development is excessive in size which will put a vast strain on the current infrastructure of the town. The plans to improve roadways are insufficient for the scale of the plans.</p> <p>The additional traffic that the developments on either side of Berkhamsted will put through Shooterway will make this road even more dangerous to cross than it currently is. The Bearroc Park development has already increased traffic on this road significantly in the morning and afternoon. It can take up to 10 minutes to cross the road to get to school with my 7 year old twins. Sometimes cars stop and usher us to cross as it's clear that we have been waiting for a long time and there is nowhere to cross, which simply makes things more dangerous as they are ushering my kids to cross towards oncoming cars travelling the other way.</p> <p>The traffic in the town is at capacity with long lines of traffic at all times of day at key junctions within the town. Berkhamsted is a small market town with narrow roads. It is not designed to withstand the scale of traffic and people of a new town.</p> <p>Sites proposed for Berkhamsted Northchurch suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development. There has already been substantial development within Berkhamsted, the true impact of which is yet unknown. I don't understand how you can make a decision to substantially increase the amount of development without waiting to evaluate the true impact of the current projects being developed (Bearroc park and the adjacent sites). I suggest the council take a 'test and learn' approach and put these plans on indefinite hold before pushing</p>

	through excessive plans which put a catastrophic strain on the town's infrastructure. <b>BRAG response to Question xx (please note full document is attached to Q46)</b>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14470
<b>Full Name</b>	Mrs M Morgan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on Green Belt in around Kings Langley because: Volume of traffic in High Street is already a problem + parking is an issue Schools + doctors services cannot stretch anymore Green Belt should not be built on and the disappearance of farmland would be a travesty - it would not be a 'village' anymore I will vote for Option 1A
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14516
<b>Full Name</b>	Mr David Griffin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<i>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</i>  <i>However, I would like to take this opportunity emphasize just a few of the most important points within that response.</i>  I formally object to ANY further building/development in Berkhamsted or the immediate surroundings. The town is already over-developed and has insufficient infrastructure in place.

I note that this is not an option for us, and so state that my preferred option of those given is Question 40/ Option 1B.

*Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate*

*excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.*

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/07/BRAG-Analysis-of-the-Green-Belt-for-the-DBC-SMVA-2016.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide textbook examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area

that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There

are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a

lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions

- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of



Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a

junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site.

We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated

- Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in



	<p>Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</p> <ul style="list-style-type: none"> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14522
<b>Full Name</b>	Edith Howell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 It is necessary to keep the Kings Langley settlements separate</li> <li>2 The increase in road traffic and noise would be unsustainable</li> </ol>

	<p>3 The proposed developments would threaten the character of Kings Langley</p> <p>4 Brownfield sites should be used <u>NOT</u> Green Belt land</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14524
<b>Full Name</b>	Mr Graeme Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Option 1A</p> <p>Kings Langley is a village and these proposals are over-development when brownfield available in DBC.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14525
<b>Full Name</b>	Mrs Niki Pinchin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>This historic village is already overcrowded with poor infrastructure, overstretched services and daily traffic queues in <u>ALL</u> directions.</p> <p>Added to the commuters, are the school run vehicles which cause significant congestion throughout the day.</p> <p>Kings Langley is a village, with a successful + entrepreneurial farm at its centre - it should be respected and protected.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14526
<b>Full Name</b>	Emma Hulse
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I have a serious health condition and often have to rely on last minute doctors appointments at an already overstretched surgery.</p> <p>We should be proud of the historic heritage of our village, and not allow it to become overdeveloped - completely losing its centuries old character</p> <p>Of all the options for development, I strongly back 1A, but this does not include Shendish (HH-H3).</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14528
<b>Full Name</b>	Katie Hulse
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• This would dramatically alter the character of the village, and Kings Langley would lose the vital 'buffer' between it and the M25. We would lose public access to green spaces, vital to health + wellbeing.</li> <li>• Services in the village are already stretched - both schools + GPs, and parking space is minimal and already pressurised.</li> <li>• There are already safety concerns due to through traffic, which are currently being investigated.</li> <li>• Both Wayside + Rectory Farms are important or wildlife, + Wayside is the home of a rarebread Jersey Cow. These matters should not be taken lightly, and Option 1A is the only possible one to be considered, but NOT including Shendish (HH-H3)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14530
<b>Full Name</b>	Richard Knights
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• The ruination of the green belt around the village is a tragic mistake.</li> <li>• History will show the people who blundered into this ill-conceived idea in a bad light. In the same way the architects of the 1980's are thought of.</li> <li>• The fact that the majority of the village object to this says it all. I am under no illusion that you will impose this upon us!!! If you do it is a scandal!!!</li> <li>• No to the ruination of Kings Langley.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14532
<b>Full Name</b>	Philomena Lockyer
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have studied the proposals for the suggested 4 residential development sites for Bovington. I first object to all 4 proposals on the basis that all are designated as Green Belt land which as a village we strongly do not want to happen. i undferstand this stance has also been confirmed recently by the Prime Minister.</p> <p>i secondly object on the basis that the roads are unsuitable for additional traffic. Three of the sites would require access from Green Lane. The fourth (Bov-h4) would requirte access from Newhouse Road. Green Lane, whilst possibly being a secondary road, is strategic to traffic movement in Bovington. It is a bus route and congestion occurs when such vehicles and other larger ones use the lane. The High Street, Chipperfield Road, Chesham Road and Hempstead Road are similarly congested, and accidnets have occured. On Saturdays the additional traffic created by Bovington Market is causing great concern. Recently virtual gridlock occurred in the Molyneux Avenue area. Thus, the additional traffic created by the possible developments using Green Lane awould greatly exacerbate local congestion, never mind causing great problems at all the new road entries.</p> <p>I thirdly object due to the problems of local services being inadequate to service such a population increase. As is well known, Doctors' surgeries are already very busy and would be unable to accommodate additional patients. The school would also be unable to take in a significant number of additional pupils. It is questionalbel whether the water supply and more importantly, sewerage provision for the area is adequate for significant</p>

	additional households. It is well known that flooding is a serious issue for the village as the pump area floods in periods of high rainfall and there is presently the need for improvements to alleviate this problem. With more hard landscaping this serious issue would become intolerable. If a plan for additional homes in the Bovingdon area be required, it is first necessary to plan the services structure to accommodate such and to use land which does not form part of the green Belt.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14533
<b>Full Name</b>	D A Mash
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the proposal to build up to 450 additional houses in Bovingdon. This represents an increase of 25% on the existing housing stock, and will severely stress the services and infrastructure of the village.</p> <p>Specifically, it will</p> <ol style="list-style-type: none"> <li>1. Require building on the Green belt, which will alter the environment of the village and destroy the village atmosphere.</li> <li>2. Roads, services such as schools, health services, and importantly drainage will be unable to cope with the additional people cars and water run off. Bovingdon has already had major issues with flooding in Bastnot, and at the memorial, as well as a death of a motorcyclist on the Hempstead Road caused by flooding. Traffic congestion is already a major issue in Bovingdon at weekends and during the rush hours Box Lane/Hempstead Road is already the busiest 'B' road in Hertfordshire.</li> <li>3. Water provision / availability will be an issue as Bovingdon is at the top of a hill.</li> <li>4. Pollution from an estimated additional 900 vehicles will cause health problems.</li> <li>5. The proposed solution adds no jobs in Bovingdon and thus more travelling will be required for work and schooling.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14536
<b>Full Name</b>	Mrs J Richardson
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In the village of Bovingdon our precious Green Belt land has been strongly defended over many years and is an irreplaceable asset which maintains the rural nature of the village as well as clear separation from other settlements. Until now, the protection of this Green Belt land has been fully supported by the borough Council.</p> <p>With the current demands for housing it is clear that the sole measure of success is 'number of new homes' and any consideration of the infrastructure, the environment or community wellbeing has been ignored. Plots of land have been identified solely on the basis that land owners, wishing to realise their investment, have offered land up for development. This means that the plots are not necessarily in a location for maximum benefit i.e close to places of work, ease of travel, near to public services etc. There is certainly no direct evidence provided in the report of the need for new homes in Bovingdon.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14537
<b>Full Name</b>	Mrs J Richardson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I understand that the strategy is to use brownfield sites before Green Belt land is considered yet, the owners of Green Belt sites have been consulted and owners of brownfield sites such as Bovingdon Airfield and the old Brickworks are ignored. The disused airfield would be ideal for future development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14538
<b>Full Name</b>	Mrs J Richardson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>1. For the building of a relief road between teh existing Bourne End junction on the A41 across to the B4505 (Chesham Road) near the County border. As a major infrastructure project I assume this would allow compulsory purchase as would projects such as HS2</p> <p>2. The new road would allow vehicle access to Bovingdon Market (many hundreds of vehicles at weekends) and the TV/Filming activities (Audiences of between 600 and 700 at a time)</p> <p>3. It would allow goods vehicles travelling to the Ley Hill commercial area to bypass residential roads in the village.</p> <p>4. In a similar way to what is happening in Baldcock the new road would encourage subsequent infil development which would permit a large amount of housing with no detriment to the village or to precious Green Belt land.</p> <p>5. Such a road would have a knock on effect by reducing traffic in the residential Box Lane and further into Boxmoor. A vast majority of traffic on the new road would be able to access the A41 truck road which is the backbone of the transport infrastructure in the Borough.</p> <p>6. The new road will be a key entry point at the County boundary for vehicles using the Maylands Gateway.</p> <p>The infrastructure in Bovingdon is over stretched alraedy and there must be no new housing inBovingdon other than that already planned and approved without significant improvements in infrastructure.</p> <p>A traffic survey on teh B4505 in 2015 showed that this residential road through the village carried 77,000 vehicles each week. Over the last two years this has increaseded significantly in particular relating to Heavy Goods Vehicles. There are a number of major influences on this road.</p> <p>1. The route from the M40 at Beaconsfield, Amersham, Chesham and through Bovingdon acts as a relief route when there is congestion on the M25</p> <p>2. The proposed house building in Chesham will add yet more traffic to this road</p> <p>3. The Bovingdon Market and the new filming activities on the disused airfield mean that on Saturdays traffic is brought to a standstill</p> <p>4. Vehicles travelling from the North West to the planned Maylands Gateway willincrease traffic further.</p> <p>The village centre school is operating at its capacity which means that the chgildren in any additional households in the village will need to travel to other schools. Yet more journeys on our over stretched roads.</p> <p>Bovingdon High Street is always congested with limited parking space already. Residents are electing to go to other shopping locations at the expense of local stores. The High strees urgently needs additional paqrking space which would encourage people to use local shops.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 46</p>
<p><b>ID</b></p>	<p>LPIO14542</p>

Full Name	Mrs J Richardson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In summary, there can be no more development in Bovingdon without major improvements in infrastructure. The Borough Council <b>must</b> make every effort to secure and develop the brownfield site which is Bovingdon Airfield for the benefit of local residents and for the whole of the Borough.
Include files	
Number	Question 46
ID	LPIO14543
Full Name	Ms Sandra Sinfield
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I object to the proposed development on the Green Belt in around Kings Langley because: I believe it is vital to retain our village and its clear identity - Recognised by all who choose to live here and held in high esteem Green spaces are integral to keeping community together - once gone they are lost forever Dairy farms are precious and only add to quality of life
Include files	
Number	Question 46
ID	LPIO14544
Full Name	Barbara Rushton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I object to the proposed development on the Green Belt in around Kings Langley because: A lot more traffic on the A4251 causing grid lock in the village, also parking for shopping, and existing houses.



	Our local hospital is already overcrowded, and so are our schools. The doctors surgery is already full, and will not except any more patients.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14545
<b>Full Name</b>	Irving Shaw
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: My preferred option is 1A It creates urban sprawl It uses Green Belt land when more sustainable land could be used Shendish is part of Kings Langley Parish which has historic connection back to the 13 century It will greatly add to an already heavily congested road system
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14547
<b>Full Name</b>	Mr and Mrs Kingsland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: As residents of Kings Langley of over 50 years we feel that the proposed development will completely destroy the ethos of the village, enveloped between Hemel Hempstead and Watford
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14548
<b>Full Name</b>	Mr John Saunders
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Option 1A is my preferred option</p> <p>The sheer scale of the proposed changes will impact on the village of Kings Langley and change it from a place where there is a strong community of people who have lived lived there and know everybody, to the outskirts of a large town (Hemel Hempstead).</p> <p>The roads and schools are already overloaded and there is no way that this could be resolved without totally changing the nature of Kings Langley</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14550
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Green Belt needs to be preserved for our future generations</li> <li>2 Brown site of empty properties needs to be looked at first</li> <li>3 Real issues with infrstructures - greedy developers do not provide enough</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14551
<b>Full Name</b>	Mr A. Angel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p>

	Emergency vehicles have trouble now getting through Kings Langley to Watford hospital. Hemel hospital is closed. All more houses are going bring more vehicles.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14552
<b>Full Name</b>	Mr Richard Mead
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ul style="list-style-type: none"> <li>• Option 1A should be followed (603 houses PA in Dacorum, provided around Hemel Hempstead, Berkhamsted and Tring).</li> <li>• Other options would result in the coalescence of Kings Langley with neighbouring settlements, irreversibly destroying this historic village.</li> <li>• The protection of the Green Belt around Kings Langley is essential to sustaining the character of the village, the dairy farm and its special community.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14553
<b>Full Name</b>	Elizabeth Checkley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I strongly object to the proposed development on the Green Belt in around Kings Langley because: <ul style="list-style-type: none"> <li>• We are a village - not a suburb of Hemel. We will 'lose our village' if this scheme goes ahead</li> <li>• Loss the fields and wild life around - the walks threw <u>Wayside Farm</u> - the farm itself and their <u>wonderful Jersey herd</u>. Their <u>unpasteurised milk</u> is the best. I have work colleagues who come out of Watford <u>especially</u> to buy their milk/farm produce. There is <u>nothing</u> else like it - unique.</li> <li>• I can <u>hear skylarks</u> when I go walking in the fields behind Wayside Farm - amazingly beautiful.</li> </ul>

	<ul style="list-style-type: none"> <li>• Where is the infrastructure /jobs to support this development</li> <li>• Thought 'green belt' was protected. We were refused planning application for a Church House because it was 'green belt' - so how is this 'plan' permissible !?</li> </ul> <p>Could say so much more</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14554
<b>Full Name</b>	Debbi James-Saunders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Option 1A is my preferred option</p> <p>We should be developing on <u>brown</u> fields sites and using empty homes across Hertfordshire</p> <p>I also object to the change development would make to the village and its community feel</p> <p>The roads already cannot cope with current traffic, it will become even more congested and polluted (noise and air)</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14557
<b>Full Name</b>	Annie Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The proposal is of a scale that will hinder rather than benefit a small village such as ours. It will call for infrastructure that is not currently in place and is overlooking the wellbeing of a well balanced and thriving village with plans motivated by greed and financial gain, ignoring the wishes of the residents from a powerful developers position</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14558
<b>Full Name</b>	Harvey Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The proposal is an example of how financial greed can overlook the wishes of the people</p> <p>The scale of development is <u>too large</u> for a small village, and should it be down to a democratic decision it would certainly not be backed by the majority</p> <p>The functionality of such a project cannot be supported by the infrastructure and services of a small village</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14559
<b>Full Name</b>	S. Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>With all the new development we have had in surrounding areas such as Nash Mills + Apsley, Ovaltine, etc. It has been noticeable how the village has been affected by traffic and pollution. To have further urbanisation forced upon us will increase pressure on our infrastructure, with roads, schools, Dr's already at bursting point. It will ruin our village and standard of life forever</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14560
<b>Full Name</b>	Alex Macziel
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on Green Belt in around Kings Langley because: Overwhelming pressure on infrastructure: <ul style="list-style-type: none"> <li>• roads</li> <li>• school</li> <li>• GPs</li> <li>• traffic pollution</li> <li>• destruction of cattle at farm</li> <li>• loss of green belt + village feel</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14561
<b>Full Name</b>	Mrs T. Wilkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: the scale of proposed development is completely disproportionate for a small village. the current infradtructure is already insufficient for the existing population, any additional development is unsustainable
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14562
<b>Full Name</b>	Mr J Wilkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Kings Langley is a small village and should remain so. There are numerous locations within Dacorum that are far more suitable for development, where the infrastructure would support further development. The

	proposals for Kings Langley are motivated by financial greed rather than viability.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14563
<b>Full Name</b>	E. Dodwell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The area don't have the infrastructure to cope will the scale of developments being proposed</p> <p>Green space is very important for our well-being + for whats left of our dwindling wildlife in the UK: we are the most densely populated country in Europe + need to reduce our population I'm afraid.</p> <p>Redevelop brown sites in city centres for residential use</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14565
<b>Full Name</b>	Mrs Susan de Silva
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Green Belt needs to be protected for us and future generations to protect air quality, psychological green space.</p> <p>Also traffic from Kings Langley to Watford during early morning + evening rush hours are already excessive. Taking 1 hr to travel both ways for a 15 min journey at other times.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14566
<b>Full Name</b>	R. Nicholls
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>with all the traffic we have going through the village already it would only make it worse.</p> <p>As for building on 'Wayside Farm' it is ridiculous to close down a good, successful business. When all brownfield sites, like those on HH business park, then think again.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14568
<b>Full Name</b>	Habeebah Saifullah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Please, please, please help us to save Wayside Farm</p> <p>It is the only hope we have to get 'raw, organic' milk</p> <p>Thank you</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14569
<b>Full Name</b>	Teresa Weston
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I feel it will ruin the historical value of the village.</p> <p>We don't have the roads or railways to cope with the demands.</p> <p>The village cannot cope with more buildings</p> <p>The historical values of the village will be destroyed</p>



<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14570
<b>Full Name</b>	Joseph Weston
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: it will ruin the village's historical identity, Kings Langley does not have the road or rail infrastructure for these proposed plans The plans will ruin and destroy the historic + important village
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14571
<b>Full Name</b>	R. R. Khanna
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: The unique village character will be lost forever
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14572
<b>Full Name</b>	Memuna Khalid
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:

	<p>My family and I visit Wayside Farm very often, it's a great day out and I can't imagine buying raw milk from anywhere else</p> <p>This farm is the most local to us and to many others please don't take it away from us</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14573
<b>Full Name</b>	Vanessa Emery
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Not only is there terrible road traffic already, there isn't enough school/doctors/dentist places as it is. Already people have to wait up to 3 weeks for a GP appointment</p> <ul style="list-style-type: none"> <li>• not enough space</li> <li>• too much traffic</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14574
<b>Full Name</b>	Mutee-ur-rehman Saifullah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>My family and I regularly visit Wayside Farm</p> <p>We enjoy the lovely environment and regularly take raw milk</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14575
<b>Full Name</b>	Ammar Abu-Qalbain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  I think I need some milk because it has calcium in it, which is good for my teeth and bones. And I like the cows and the meadow (Please save the farm)
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14576
<b>Full Name</b>	Nick Karavias
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  we moved here to be part of a village, to have that community feeling, the proposed developments eliminate this and will just create another crowded town
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14577
<b>Full Name</b>	Leigh Karavias
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  Kings Langley is a village, by building these additional houses you remove this from us, which is why we moved here  If I wanted to live in a town I would have moved to one!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14578
<b>Full Name</b>	mr brian owen
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I was born in this village and I want my grandson to love in this village not part of an urban conurbation including Watford and Hemel Hempstead.</p> <p>I want him to walk in the fields I walk in.</p> <p>Also because it is a village it has a narrow High Street which is often blocked with traffic. More people would make this worse (emergency vehicles?)</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14579
<b>Full Name</b>	Helen Owen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I moved into the village in 1988 from a town so I could enjoy the countryside on my doorstep and the good local amenities.</p> <p>With the amount of building being proposed big problems will be generated with traffic, parking, doctors, schools will not be able to cope.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14580
<b>Full Name</b>	Bethan Tossell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on Green Belt in around Kings Langley because:</p> <p>not only will it destroy local businesses but it'll destroy much needed farm land and wildlife.</p>

	Kings Langley is already a heavily saturated area + more effort should be made to fill empty houses in less popular areas to boost those towns rather than destroying 'easier areas'
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14582
<b>Full Name</b>	Mrs R. Prentice
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The Green Belt around the village should not be built on. The village needs its green space. This is a threat to the villages character</p> <p>Amenities are already under stress</p> <p>We need a sustainable population</p> <p>All proposed sites are farm land. We need to grow food not houses, this is totally short sighted.</p> <p>Wayside Farm does not belong to DBC. We need growth in crops.</p> <p>'Community welfare', not profit focused (can't read word) builders.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14584
<b>Full Name</b>	Mrs Lesley Turner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I have lived in Kings Langley for almost forty three years and have gradually seen the character of the village changing with these proposals</p> <p>Kings Langley will no longer exist as a village but will become an extension of Hemel Hempstead</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO14585
<b>Full Name</b>	Terry Pant
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: As a village the roads + hospitals + schools can not cope with anymore
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14586
<b>Full Name</b>	Mr Philip Mills
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I have used Wayside Farm now for a few years and its a great benefit to my health
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14587
<b>Full Name</b>	B. Gardner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: to keep the farm because people like seeing the animals and feeding the animals and buying vegetables, biscuits and bacon, sausages, eggs from the farm shop
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO14588
<b>Full Name</b>	Mrs Nicola Mills
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I buy products from Wayside Farm which I cannot buy anywhere else and they really improve my health
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14589
<b>Full Name</b>	Ken Barber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I am a customer of the farm and regularly bring my gran kids to see the animals
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14590
<b>Full Name</b>	Mrs M. Butcher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: at Wayside Farm 1 Children are learning at first hand about the animals - school visits are popular. Becoming aware of their environment. Learning to respect nature.

	<p>2 Families are able to feed themselves on high quality produce - reasonably - esp milk and eggs and veg</p> <p>3 These green spaces are a valuable resource to the community - allows us to breathe, move freely</p> <p>4 Brownfield sites to be used first please</p> <p>5 Have been able to improve own and husbands nutrition. Thank you Wayside Farm</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14592
<b>Full Name</b>	Brenna Mascord
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Love to see animals roaming freely + providing such lovely milk</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14593
<b>Full Name</b>	Fatemeh Moinie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Not only is it vital to try and retain green spaces, from an environmental point of view but it allows for members of the community to enjoy the space</p> <p>Wayside Farm is a lovely farm, a great attraction for visitors (Ramblers and hikers enjoy the public footpaths too). It has educational value too. To take that away removes the beauty of being in that community.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14594
<b>Full Name</b>	Terri Huntley
<b>Company / Organisation</b>	



<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I travel a distance for milk as it helps my stomach and fresh fruit veg is amazing
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14595
<b>Full Name</b>	Ikram Hussain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Being one of two remaining farms in Herts, it needs to be preserved + given the recognition it deserves. My son, alongside other members of my family + close friends have all benefited from the milk provided, the land to roam on for when the weather is nice + for peace of mind. A real shame that this development is even being considered!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14596
<b>Full Name</b>	Florentina Neculcea
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: It's a place where you can by healthy food and teache the kids to eat healthy
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO14597
<b>Full Name</b>	David Salter
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I drive from Dartford for the milk
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14598
<b>Full Name</b>	Lewis Chamberlain
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on Green Belt in around Kings Langley because: It will destroy business around that area and the green land and wildlife. Should be investing money in filling houses in areas that are not being lived in or need work on them for people to live in them.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14600
<b>Full Name</b>	John Mascord
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: It is destroying more green belt and a farmers livelihood. Also stopping a farm providing healthy milk from healthy animals. We need more farms like these not more housing which can be built elsewhere, not on our needed farmland.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14601
<b>Full Name</b>	John Try
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Its nice to have a working farm near by. Fresh milk tastes like I used to know growing up. Don't let this green gem be built on!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14602
<b>Full Name</b>	Mrs Rita Try
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I always get my milk and veg from the farm, it reminds me of my younger days.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14603
<b>Full Name</b>	Mrs Carolyn Connor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Kings Langley won village of the year in 2012 if the proposed development were to go ahead this would ruin

	<p>the village character. Not to mention 'village status'. We would be joined in coalescence with Hemel.</p> <p>We do <u>NOT</u> need more office space at Wayside as there are offices to let in the North of the Borough.</p> <p>There should be no building on green belt land in Kings Langley.</p> <p>Wayside Farm is Charlie Wray's home and 1 of only 2 Jersey herd farms. The village had a crowd funding page when the honesty box was stolen when Charlie decided to sell raw milk. The funding paid for the vending machine.</p> <p>Many people use the right of way to walk across the fields and visit the farm. It is a vital part of the village and must stay and not be demolished to make way for houses!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14605
<b>Full Name</b>	John Try
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I regularly use the farm for milk and fresh produce. Friendly people who work long and hard for the community.</p> <p>I live and was born in West Watford and have witnessed what a BAD effect over development can have!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14606
<b>Full Name</b>	Sandra Wicks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>it's a super working farm, they have built up a fantastic business</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14607
<b>Full Name</b>	Colwin Jaywackn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: I like open space which I believe is essential
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14608
<b>Full Name</b>	Lucy Hastings
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: The farm is and always has been an integral part of the village life from a long association with the Rudolf Steiner School to the farm shop which is so popular with the villagers. Also the local schools + doctors + roads are already stretched to the limit. Former resident of KL
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14609
<b>Full Name</b>	Faveed Annee
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: This is an abuse of power. We need farmers as we a leaving the EEU

	Please look at your conscious (can't read word) Town Council. Please reject the propose planning permission.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14610
<b>Full Name</b>	Margaret Mascord
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: You would be taking away our opportunity to have fresh eggs and raw milk. We need farms like this. Thank you
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14611
<b>Full Name</b>	Paul Hines
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Green Belt should be protected not swallowed up under a sea of concrete There are only (only!) two working dairy herds in Hertfordshire. Wayside Farm should be protected not threatened will forced closure Kings Langley and Abbots Langley are creaking under the pressure of new homes and the resulting traffic congestion Please please please keep them as villages not towns!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14613
<b>Full Name</b>	Sumedhu Jayasinger
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14614
<b>Full Name</b>	Catherine Blake
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  The village needs to remain a village. Already the doctors, parking are overcrowded.  Wayside Farm is a working farm, one of only two in the area, and one of two in Hertfordshire producing Jersey milk and produce.  The village would become a superb and we want a village.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14615
<b>Full Name</b>	Mrs D. Hines
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  Wayside Farm is a busy working farm, which provides raw milk, with its many health benefits, to the local and surrounding areas. There are also many people who travel long distances to obtain the milk.  There is now a shop which creates a focus for a social gathering. The farm is important to young people as they can visit and tour round the farm - which is great

	<p>education for them especially those who struggle with formal education.</p> <p>We need to keep green areas for the youth of today it is beneficial to all peoples mental state.</p> <p>The road systems cannot cope with more congestion.</p> <p>Use empty houses in the area BEFORE you build new ones!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14617
<b>Full Name</b>	Adele Herring
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It is a lovely village the way it is.</p> <p>There's not enough Dr's, schools or roads to accommodate this development.</p> <p>We need to keep the green belt areas and build on the brownfield sites instead.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14619
<b>Full Name</b>	Brian Evans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in <del>around</del> Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 There are adequate brownfield sites that <u>need</u> to be revitalised</li> <li>2 Development of Bovington Airfield into a <u>small</u> 'New Town' would take the pressure off 'Green belt' 'fill ins'</li> <li>3 NO development at all unless the road/highways can be expanded - otherwise Log Jams within 5 years</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46



<b>ID</b>	LPIO14621
<b>Full Name</b>	Jennifer Barnes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>my husband and I and two small children moved here 40 years ago from a TOWN, to live in this beautiful VILLAGE, surrounded by greenfields and farm land, and to live the VILLAGE life with our family to grow up in.</p> <p>The plan to build all these new homes will not only turn our VILLAGE into a town, but the roads and lanes, which are already struggling with constant traffic will literally cease to function totally.</p> <p>Please do not proceed to destroy our Green Belt beautiful VILLAGE, we already have the M1 + A41 bypass surrounding us. Let us keep our historic past and beautiful greenfields and FARM LAND and our green belt way of life</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14622
<b>Full Name</b>	Geoffrey Attewill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I think there is a knee jerk reaction to the housing problem + there is over development all over the country. Particularly in this area. It will overwhelm the infrastructure. Destroy good farm land + rural business Driven by the consortium industry for profit.</p> <p>The Government should manage the causes over population and foreign investment purely for profit.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14623
<b>Full Name</b>	dr kim goode
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: The need for these houses is unclear. I would not object to sustainable eco housing but not on the greenbelt. Please use brownfield sites.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14626
<b>Full Name</b>	mr william ashford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  <ol style="list-style-type: none"> <li>1 These plans will change the village into a town becoming part of Hemel Hempstead or Watford in time</li> <li>2 The traffic through + around village already a nightmare - roads are in dire need of repair as is</li> <li>3 Why are Green Belt areas being used?</li> <li>4 Destroy village life as we know it</li> <li>5 Insufficient schools, doctors already</li> <li>6 Further strain on services - road surface, drain clearing, road repairs, water, electricity.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14627
<b>Full Name</b>	Douglas Barnes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: the locality is already basically grid locked every week day mornings and rush hour times (has nobody noticed)

	<p>None of the infrastructure problems have been addressed in the past and the present, roads, drainage, parking, the disgusting state of the roads.</p> <p>Fly tipping because of insufficient waste disposal sites that work to full capacity. Doctors, dentists, hospitals, schools (children travelling miles often to get to a school they don't want attend due to standards).</p> <p>Stop the greed and concentration to figures, ITS PEOPLE LIVES THAT COUNT.</p> <p>Kings Langley's history is well documented, its magnificent farmland has always been more than successful, its woodlands, field and water courses are absolutely essential to so much wild life, we as humans cannot afford to destroy it..... Just to make the desired figure count up.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14628
<b>Full Name</b>	John Chipperfield
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>There will be no open spaces left, one huge conglomeration 'Hemelford', Kings Langley reduced to an urban district.</p> <p>Infrastructure, particularly utilities, is only just adequate for the existing households at present and is decaying</p> <p>At present huge long traffic queues choke our main roads at both ends of 'rush hour'.</p> <p>Wayside Farm is one of only 2 dairy farms in the Dacorum Borough, if office space is at such a premium, why was part of West Herts College (Home Park Mill Link Road) given over to flats? Surely there is enough on Station Road/Primrose Hill for offices?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14629
<b>Full Name</b>	Beverley Ross
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>the Green Belt is sacrosanct, with the M25 and A41 bypass in proximity, we need all the green space and trees to combat pollution. Every one knows the benefits of the countryside for well being it should be enhanced not destroyed.</p> <p>Wayside Farm is a much loved and well used asset, promoting community and a chance to experience farming and for the young to learn where milk comes from and should be preserved for future generations.</p> <p>All the building works in Apsley are already having an effect on Kings Langley, with busier roads and parking problems. Our area cannot take anymore without a massive impact on the infrastructure which just cannot cope.</p> <p>Enough is enough.</p>
Include files	
Number	Question 46
ID	LPIO14630
Full Name	Suzy Brownson Fowler
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>with the M25 so near we need to hold onto our green spaces, to protect our <u>air</u> and <u>land</u> and keep our <u>trees</u>.</p> <p>Also the real consideration of the people in the village and their <u>mental</u> + <u>physical well being</u>.</p> <p><u>Children</u> love to go to <b>Wayside Farm</b> - we need the younger generations to have the opportunity to be learning (and experiencing) about nature/animals. This is perfect at this farm (in fact schools could use it more!?)</p> <p><u>Shendish</u> grounds have a good selection of old <u>trees</u> and in one area at least three types of wild orchid.</p> <p>People here choose not to be in a Town/City. We need to protect this for the village and for the effect of the towns near by as well as the villagers. There are our assets... once destroyed gone forever.</p>
Include files	
Number	Question 46
ID	LPIO14631
Full Name	Alan and Gillian Busby
Company / Organisation	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>as residents of Kings Langley for 52 years. We are very concerned about the proposed plans to build houses on the green belt land.</p> <p>The congestion through Kings Langley High Street at present is already a great cause for concern.</p> <p>Building so many houses will over populate our small village, and put so much pressure on the facilities and infrastructure.</p> <p>Kings Langley needs to remain the lovely village it is.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14632
<b>Full Name</b>	P. Sapte
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>If the Local Plan is carried out Kings Langley will no longer be a village. The continuation of the Green Belt is of vital importance to the whole community</p> <p>Any major increase in the population will lead to the village becoming totally grid locked during much of the day</p> <p>Before any development takes place an achievable plan for traffic, schools, etc and travelling must be decided and generated.</p> <p>INFRASTRUCTURE is the most important factor in any plan.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14633
<b>Full Name</b>	Habeebah Saifullah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I am a student living in St Albans I came to Kings Langley purely for the farm (Wayside Farm) (the 2 dairy farms), to buy 'fresh, organic and raw milk' which is not available to me anywhere else as this is the closest farm to me that allows me to buy 'raw milk'.</p> <p>I strongly urge you to take not only the local opinions / protests but those who live in others districts, who commute far just to get 'raw milk' from Wayside Farm in order to live a healthy organic life.</p> <p>Thank you for your help.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14634
<b>Full Name</b>	Amira Hussein
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>surrounded by so many artificial foods we need to open not close places like the farm!</p> <p>We have to realise that we're humans &amp; need normal, pure food as well as environment instead of another cement blocks.</p> <p>Destroying our human being and disconnecting us from the Mother Nature.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14635
<b>Full Name</b>	Mr M. Sheldrake
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Future development should be restricted to <u>brownfield</u> sites and not green belt sites</li> </ol>

	<p>2 Proposed development does not make adequate provision for improvement to infrastructure - medical facilities, roads, parking, footpaths, cyclists</p> <p>3 Any future development should avoid coalescence between Kings Langley / Hemel Hempstead + neighbouring towns this is not fully recognised in some options.</p> <p>4 Any future development should be restricted to area immediately around Hemel Hempstead/Tring/Berkhamsted to prevent coalescence and where provides retain character of the village</p> <p>5 Of the 3 broad options proposed in consultation paper I favour <u>Option 1 A</u></p> <p>6 Consultation paper makes with little reference to recreational facilities - either indoor or outdoor</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14639
<b>Full Name</b>	Mr A. Miles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in and around Kings Langley because:</p> <p>we need to look very carefully into these developments - what type of houses are proposed high end expensive or affordable smaller units so single older residents of Kings Langley could downsize without moving out of the village.</p> <p>If some house building is inevitable it needs to be co-ordinated and planned - the roads in and around Kings Langley are already congested, more people means more cars. We already have serious parking + congestion issues in Kings Langley.</p> <p>We cannot build on our green belt sites without risking the destruction of the very fabric of our village.</p> <p>For this reason I support Option 1A.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14643
<b>Full Name</b>	Mrs J. Miles
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in and around Kings Langley because:</p> <p>this area has reached infrastructure saturation level. The roads in particular are congested, not just at peak times.</p> <p>We cannot encourage economic growth if goods cannot be transported within our area and people are not able to go about their business i.e. trades etc.</p> <p>Doctors, hospitals and schools would all need to be increased, if we increase the number of residents. Where will these come from?</p> <p>If we need to build more houses we need to look very carefully at where we put them + how many or we risk destroying the fabric of our society, the local countryside and our village</p> <p>I support option 1A</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14645
<b>Full Name</b>	SHEILA SHELDRAKE
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Kings Langley village is surrounded by major roads - M25 to south A41 to west + M1 to east. The <u>green belt is vital</u> to help minimise <u>pollution levels</u>, <u>urban sprawl</u> and <u>coalescence</u> with Hemel Hempstead and Watford</li> <li>2 If many more houses were built it would <u>destroy the historic character</u> of Kings Langley, with its listed buildings, independent shops, wildlife, rural aspect, trees with TPOs + areas of archaeological significance.</li> <li>3 There is horrendous <u>traffic congestion</u> now <u>ambulances can take 20 mins</u> to pass through Kings Langley High St. During rush hour the traffic is solid from the M25 to the High St Junction 20 is already inadequate to cope with current traffic levels.</li> <li>4 Houses should be built around the 3 major towns, where the jobs are. Cycle tracks and footpaths can be improved to minimise car use. Therefore <u>Option 1A</u> is my choice.</li> <li>5 Empty offices, shops and factories could be converted to housing</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46



<b>ID</b>	LPIO14648
<b>Full Name</b>	Alex Ashman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• We should be building on brownfield, not greenfield sites</li> <li>• Must avoid the area becoming one large urban sprawl</li> <li>• The character of the historic village of Kings Langley should be preserved</li> <li>• There are empty offices in nearby Apsley, so we don't need more.</li> <li>• Charlie Wray's tenancy agreement for Wayside Farm should be respected and his rights observed.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14650
<b>Full Name</b>	Pauline Quelch
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>there is not enough infrastructure</p> <p>Only one hospital that can't cope now. Traffic going to hospital in emergency impossible</p> <p>Traffic through Kings Langley and parking impossible</p> <p>Have lived in Kings Langley all my life because it is a lovely village and I don't want it to be joined to Hemel.</p> <p>Wayside Farm is one of only two dairy farms in Herts.</p> <p>Green Belt should be kept as such, we need some open spaces.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14652
<b>Full Name</b>	Mrs Patricia Hansard
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>RE: Kings Langley</p> <p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• Green Belt sites should never have housing on them, only brownfield.</li> <li>• Kings Langley High St is gridlocked most of the time</li> <li>• The schools road are a nightmare at opening and leaving times. We don't have the infrastructure to cope, (roads, schools, parking, doctors, hospitals, public transport).</li> <li>• A further possible 6-10,000 people is absolutely unthinkable + totally unnecessary.</li> <li>• There are empty units on Maylands so why do we need work units. Half of Maylands has already been changed to housing</li> </ul>
Include files	
Number	Question 46
ID	LPIO14654
Full Name	Mrs Maureen Dyer
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Keep the village as a village if over developed it will become a town. <u>No thank you</u></p> <p>The roads won't cope, traffic at present is chaotic. Infrastructure e.g. sewerage, electric, water, etc</p> <p><u>Hill Farm</u> development too close to existing school</p> <p><u>Wayside Farm</u> also will put the farmer out of business and home.</p>
Include files	
Number	Question 46
ID	LPIO14655
Full Name	Mr D. Hansard
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>RE: Kings Langley</p> <p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• it is Green Belt &amp; would double double the size of our village which is already gridlocked most of the time.</li> <li>• I live near the two schools and the roads are a no go areas at entry and exit times already.</li> <li>• Brownfield sites only should be used, and then infrastructure (schools, doctors, hospitals) are essential</li> <li>• How could our village cope with up to 8,000 people moving in, it could not possibly</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14657
<b>Full Name</b>	Miss Giulietta Cinque
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ul style="list-style-type: none"> <li>• to more than double the housing capacity of Kings Langley would destroy the village.</li> <li>• It would become a suburb at Hemel it is already gridlocked at times.</li> <li>• There are empty houses in other parts of the country. Use those rather than ruin Kings Langley</li> <li>• Do something about the populations growth!</li> <li>• Where are the 3,850 plus people coming from?</li> <li>• Its all due to greed of the government and councils who own the land. Farmer will lose his home and livelihood.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14658
<b>Full Name</b>	Mr Richard Baker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  Kings Langley is a lovely village already struggling with traffic + parking problems any more development would caused chaos
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14659
<b>Full Name</b>	Anita de Meza
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  Kings Langley is an ancient village with lots of history. The development would completely change the village into a small town or an appendage of Hemel.  Also there is not enough infrastructure and it would not be able to cope with the extra traffic, extra children needing schools + doctors surgeries would not be able to cope. They find it difficult to offer appointments already! The development will double the size of the village.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14660
<b>Full Name</b>	Rosemary Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  I had always understood that the purpose of a Green Belt was to provide a healthy, green break between developments  Also, it is not the people of Kings Langley who would benefit from the housing but outsiders who would presumably flock to the area very happily and further congest our lovely village.
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14662
<b>Full Name</b>	K Mash
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to strongly object to the proposal to build up to 450 additional houses in Bovingdon. This represents an increase of 25% on the existing housing stock, and will severely stress the services and infrastructure of the village.</p> <p>Specifically, it will:</p> <p>1 Require building on the Green Belt, which will alter the environment of the village and destroy the village atmosphere.</p> <p>2 Roads, services such as schools, health surgeries and importantly drainage will be unable to cope with the additional people cars and water run off. Bovingdon has already had major issues with flooding in Eastnor, and at the memorial, as well as a death of a motorcyclist on the Hempstead Road caused by flooding. Traffic congestion is already a major issue in Bovingdon at weekend and during the rush hours. Box Lane/Hempstead Road is already the busiest 'B' road in Hertfordshire.</p> <p>3 Water provision/availability will be an issue as Bovingdon is at the top of a hill.</p> <p>4 Pollution from an estimated additional 900 vehicles will cause health problems.</p> <p>5 The proposed solution adds no jobs in Bovingdon and thus more travelling will be required for work and schooling.</p> <p>I trust that my views will be represented to the planning committee.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14663
<b>Full Name</b>	Joy Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Regarding the proposed development at Ivy House Lane Berkhamsted.

	<p>Enough is enough !</p> <p>The proposed development of housing adjacent to Ivy House Lane is totally inappropriate and unnecessary and will cause a major and detrimental impact on a beautiful historic town and its surrounding area.</p> <p>1 Ivyhouse Lane is no more than a car wide and the access from George Street virtually impassable from parked cars. Hunters Park and Meadway are both accessed from Gravel Path a narrow steep and winding road with a “week bridge” at the town end. The safer Gravel Path group had researched this road over several years after many accidents and have published their findings recommending no increases in traffic.</p> <p>2 Berkhamsted has built many houses in the last 10 years, Bearoc Park, Bank Mill, Beechcroft and Sheldon Lodge as well as individual houses.</p> <p>3 The station carpark even with its second story is completely full and Bridgewater Road is parked all along making it virtually impossible to drive along.</p> <p>4 Doctor’s surgeries and schools are overwhelmed already and hospital services complete inadequate.</p> <p>Berkhamstead Town cannot cope with the people traffic and resources that this increase in population would bring.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14667
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>DBC Local Plan for Kings Langley and other areas in the Borough to build 10940 homes on Green Belt and Agricultural land and the number for Kings Langley is 4000 + is beyond belief! That number will more than double the homes we have at present. This huge development will affect everyone, with increased traffic, worsening air pollution, parking and road safety especially for pedestrians and cyclists. Some more obvious concerns: -</p> <p>WE HAVE ALREADY</p> <p>1 OVER-SUBSCRIBED SCHOOLS</p> <p>2 OVER-WORKED LOCAL GP SERVICES</p> <p>3 CAR PARKS FULL</p> <p>4 TRAFFIC QUEUES IN AND OUT OF THE VILLAGE</p> <p>5 A41 BY-PASS UNDER PRESSURE WITH TOO MANY VEHICLES</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14670
<b>Full Name</b>	Ann Bunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	At the same time these developments will inevitable BLURR OUR VILLAGE BOUNDARIES and also we would LOSE OF VILLAGE SOCIAL AND HISTORIC CHARACTER AND IDENTITY.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14690
<b>Full Name</b>	Mr & Mrs B West
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are writing to object to the proposed building of so many new homes in Bovingdon.</p> <p>With little to no infrastructure improvements planned, the awful traffic congestion and parking problems the village already suffers will get much worse. Medical and Community Services are already struggling to meet the needs of existing residents and Bovingdon Academy has few opening and cannot expand in its current location.</p> <p>Any level of significant development in Bovingdon is not sustainable and will negatively impact the quality of life in our village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14703
<b>Full Name</b>	mr ron perkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>The proposal to build on green belt land is totally unsustainable and Kings Langley would meld with Watford or Hemel Hempstead.</p> <p>Traffic congestion would be horrific</p> <p>Parking would be non existent</p> <p>Doctors, dentists and schools would be unable to cope.</p> <p>Also water, sewage and electricity supplies would be inadequate.</p> <p>None of the sites in and around Kings Langley are suitable including Shendish Manor.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14704
<b>Full Name</b>	mr ron perkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Also Wayside Farm is a business that is providing milk and other items for the village.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14711
<b>Full Name</b>	Mrs Jean Perkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Kings Langley is a village and needs to remain so, to contemplate building on any green belt land is unacceptable. Especially as there are over 1000 unoccupied dwellings in Herts and brownfield land.</p> <p>If these houses as planned were built the infrastructure is totally insufficient to cope. i.e.</p> <p>Roads</p> <p>Schools</p> <p>Doctors</p> <p>Dentists</p> <p>Sewage</p> <p>Water</p> <p>Parking</p> <p>To name a few.</p>



	It must be noted that none of the sites in Kings Langley are suitable for development including Shendish Manor.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14723
<b>Full Name</b>	Mrs J M Ensor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Bovingdon is a village limited school places, doctors and already too many cars – we cannot grow anymore without severe hardship all around. Please understand that we the residents of Bovingdon have to live with your decision <u>not you</u> .
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14724
<b>Full Name</b>	D Sheppard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I feel particularly strongly that if option Bov-h1 is chosen, then access should not be through Pembridge Road, as this is already heavily used.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14725
<b>Full Name</b>	D Sheppard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I wish to highlight that before any further housing development in Bovingdon, the necessary infrastructure changes must be carefully planned and implementation of the required infrastructure changes must be in place

	by the time any further housing developments are completed.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14726
<b>Full Name</b>	Sara / Adrian Polley / Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We are writing to express our concern regarding the proposed sites for development around the village.</p> <p>We have lived in the village for 23 years and have raised our children here. During that time, we have seen a real increase in traffic through the village, parking issues, particularly for the High Street, schools and local GP surgeries.</p> <p>As a relatively small village, the impact of a substantial development of housing would exacerbate these issues considerably. We do not have the infrastructure in place to cope with the added demands this will bring.</p> <p>In addition to these concerns, we feel strongly that the very essence of this village will be lost. We have a thriving and friendly community which has managed to retain our independence and village focus. We have clear boundaries with the attractive green belt land that surrounds the village and if this were to be lost we would become no more than a suburb of Watford and Hemel Hempstead.</p> <p>Our schools and GP surgeries are already suffering from over subscription and dilution of services available to the community and this will be further stretched with a new influx of residents.</p> <p>We love our village and our community and don't want to lose what we as residents have worked so hard to preserve.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14727
<b>Full Name</b>	Sara / Adrian Polley / Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	Larger towns such as Hemel Hempstead and Watford have brownfield sites available which would be far more suitable for this type of development.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14728
<b>Full Name</b>	Mr Alan Gurnett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Planning Application 4/00041/10/FUL; land to rear of 16-20 Church Street , Bovingdon was rejected by DBC but then appealed (appeal reference APP/A190/A/10/2126642). In dismissing the appeal the Inspector (paragraphs 14 &amp; 16) indicates that this land should be kept open as a transition between the built up part of Church Street and the Green Belt. This is the most recent ruling I am aware of that relates to and highlights the importance of the Green Belt for the village of Bovingdon. It is nonsensical, therefore, to have 4 areas of Bovingdon Green Belt under consideration as sites that could be appropriate for development.</p> <p>These proposals also conflict with DBC's Core Strategy aim to 'minimise impact on Green Belt' and 'safeguarding the countryside'. In addition it is recently restated Government policy not to build on Green Belt sites but rather to concentrate new development on Brownfield sites and in areas where employment and communications already exist. This suggests that DBC should be focussing its attention on Hemel Hempstead, Tring and Berkhamsted for the major proportion of any development requirements.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14730
<b>Full Name</b>	Mr Alan Gurnett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Even this amount of development is greater than the current village infrastructure can cope with, so there should be a <u>moratorium</u> on new building in Bovingdon until such time as there has been;

	<p>1) Action taken to deal with traffic congestion on the B4505, High Street, Green Lane and other roads.</p> <p>2) Provision of village centre car parking</p> <p>3) Increases provision of nursery and school places, and of medical facilities</p> <p>4)Amelioriation of flooding problems in various parts if the village</p> <p>5) Upgrading of the sewage disposal system which is once again close to breakdown - aggravated by the continued flow of surface water into the foul water system and the fact that Thames Water have inadequate records of the system and over many years now have made little or no attempt to sort it out. It is some 35 years since I was instrumental (with others) in getting Thames Water to do something by threatening legal action - that does seem to be the only way to move them away from their natural state of complacency., Having initially refused to acknowledge any problems they found that they needed to install new larger pumps in the Church Street pumping station and run enlarged sewer pipes to it and from it back to the Shantock sewage farm. Since the work was done there are many more houses in Bovingdon so the whole system is not surprisingly again under severe pressure.</p> <p>In summary, i do not consider that any Green Belt land in Bovingdon (or anywhere else in Dacorum for that matter) needs to be or should be developed, and that I support Build Option 2B provided that all aspects of the village infrastructure are made <u>fit for purpose</u> before any further development is commenced.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14732
<b>Full Name</b>	Mrs Audrey Beach
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I refer to the above local plan covering proposed development of new housing in the locality and, how this will affect the village of Bovingdon.</p> <p>As the village is at present, the infrastructure is barely sufficient to sustain the village. The local school cannot take all local children that should go there, and, in consequence, they are having to be bussed to other localitie. The Doctors and Surgeries are barely enough to cope with present demand with wait times for appointments being very high. The provision of Gas and Electricity with BT telephone services, together with water, sewerage and drainage services are all under great pressure now, as we have all seen with the call</p>

	<p>outs of the respective service trucks on local roads. This can only get worse.</p> <p>The natural environment is already under pressure with underground water levels, even at this time of year, being at a veru low level and this will only get worse as humanity interferes. This will mean water rationong throughout the year not just the summer time.</p> <p>Traffic is going to increase which will have a dramatic and disastrous effect on journey times and on pollution levels. The local village roads presently, are at peak capacity at certain times of the day and night with not only local people trying t o go about their business but also 'through' traffic making its way to Chesham, Hemel Hempstead &amp; Chipperfield and beyond. This traffic also contains large lorries. The proposed new Tesco branch in the centre will exacerbate the problem as soon as construction starts, and this will continue as the branch starts to trade no matter what traffic solutions are put in place. this development should never have been allowed.</p> <p>The present village population should be able to enjoy the areas of green belt that havce been saved from development by our forefathers as should all other communities with their green belt land.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14734
<b>Full Name</b>	Mrs Audrey Beach
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Whilst some development of Bovingdon will become necesary and desirable over time what is now being proposed is completely wrong. The building of any new homes should only be contemplated after action has been taken to solve the overcrowded High Street, make more provision within our local school to accomodate our children, expand our medical facilities and provide parking which is badly needed and increase all services.</p> <p>The four sites being considered in Bovingdon are completely unsuitable through over density and our Councillor's and Town Planners should remove them fromthe plan. this proposed housing plan will ensure the environment is ruined for all including any new resident and will spoil the character of the village</p> <p>We would ask all Councillors of both Parish and Dacorum to vote totally against this development and protect nature.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14735

<b>Full Name</b>	R.W. Parsons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>With reference to the Local Plan, my view is that there should be no further development to the south of Berkhamsted, but that the areas Be-h3 and Be-h7 should be used to build public housing for rent at sensible rates such that young people may have a home of their own.</p> <p>In parallel with these developments there must, of course, be given due thought to school places and doctor and hospital capacity.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14737
<b>Full Name</b>	Mrs Elizabeth Gentle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am strongly opposed to the inclusion of the site reference Tr-h5- land adjoining Dunsley Farm Tring for the following reasons:</p> <p>This site has been overwhelming rejected previously.</p> <p>It is in the GREEN BELT which allows a green corridor into town which is at the foothills of the Chilterns AONB.</p> <p>It would create urban sprawl destroying the attractive town approach, the traffic is bad now and with building on this site traffic congestion would make entry into Tring very difficult.</p> <p>Building on this site would also create problems on the adjoining road network with pollution from cars, lorries and street lights.</p> <p>This loss of farmland would eradicate wildlife, of great importance to our national environment.</p> <p>This beautiful outlook towards the hills must not be destroyed, if it is built on it will spoil Tring for ever.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14738
<b>Full Name</b>	Mrs Elizabeth Gentle
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am also strongly opposed to the AMOUNT of proposed development between the land west of Marshcroft Lane and the land to the north of Station Road. Again it would create more urban sprawl destroying wild life and the countryside around an exceptionally beautiful town. It is far too near the Chiltern escarpment and the Ashridge Estate. All local amenities.</p> <p>The nearby Tring Station with its already congested approaches and forecourt could not take the extra traffic this development would create.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14739
<b>Full Name</b>	Mrs Elizabeth Gentle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Obviously more housing is needed throughout Dacorum and some development around the existing town buildings would be possible but the green surroundings must be kept intact for future generations to enjoy if not the beautiful town of Tring will be lost.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO14740
<b>Full Name</b>	Mr John Hislam
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have studied the proposals for the suggested 4 residential development sites for Bovingdon. I first object to all 4 proposals on the basis that all designated as Green Belt land which as a village we strongly do not want to happen. I understand this stance has also been confirmed recently by the Prime Minister. The suggested developments do not constitute “exceptional circumstances”.</p> <p>I secondly object on the basis that the roads are unsuitable for additional traffic. Three of the sites would require access from Green Lane. The fourth (Bov –h4) would require access from Newhouse Road. Green Lane, whilst possibly being a secondary road, is strategic to traffic movement in Bovingdon. It is a bus route and congestion occurs when such vehicles and other large ones use the lane. The High Street, Chipperfield Road, Chesham Road and Hempstead Road are similarly congested, and accidents have occurred. Box Lane is an incredibly busy road and on Saturdays the additional traffic created by Bovingdon Market is causing great concern. Recently, traffic was completely gridlocked for several hours in the Molyneaux Avenue area, near the Prison. The High Street is itself already very congested and the additional traffic created by the possible developments using Green Lane would greatly exacerbate local congestion, never mind causing great problems at all the new road entries.</p> <p>I thirdly object due to the problem of local services being inadequate to service such population increase. As is well known, Doctors surgeries are already very busy and would be unable to accommodate additional patients. The school would also be unable to take in additional pupils.</p> <p>If a plan for additional homes in the Bovingdon area be required, it is first necessary to plan the ‘services’ structure to accommodate such. This means at the very least, road improvements and more school facilities.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14793
<b>Full Name</b>	Ms Paula Farnham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	



Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has (or will be) responded (ing) in full to the 'Issues &amp; Options' consultation. I could make similar comments in response, but in order to make this simple, please accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p>However, I would like to take this opportunity to emphasize just a few of the most important points within that response.</p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process (see <a href="http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Response-to-Consultation-on-the-Draft-Schedule-of-Site-Appraisals.pdf">http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Response-to-Consultation-on-the-Draft-Schedule-of-Site-Appraisals.pdf</a>)</p>

for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt Boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station.
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the
- Not well related to existing housing.
- Visual impact on important gateway to town from A416 and
- Proximity of A41 byoass
- Potential impact on the setting of Ashlyn's Hall

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land

- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site

appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case

providing NO 'sustainable Prosperity' to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor



- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective

- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
  - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway

- Impact on setting of the
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little

likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Encroachment of the urban area along the valley bottom and into adjoining open countryside
- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt

	<ul style="list-style-type: none"> <li>• Site lies within CAONB – large-scale development opportunities to be avoided</li> <li>• At a distance from immediate urban edge and would extend town further into countryside</li> <li>• Close to ancient woodland</li> <li>• Loss of leisure facility <ul style="list-style-type: none"> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage <ul style="list-style-type: none"> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> </ul> </li> </ul> </li> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14795
<b>Full Name</b>	Mr T Putman
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ol style="list-style-type: none"> <li>1 a) Generally, I challenge the plan on the simple basis that the proposals will expand Tring to a degree that it will be transformed from a Market Town in a rural setting adjacent to the Chilterns Area of Outstanding Natural Beauty into an overcrowded urban neighbourhood. Specifically, below I propose to criticise, constructively, Plans for Sites Tr-h2 and Tr-h1.</li> <li>2 b) It is accepted in the Analyses that the present infrastructure of Tring (e.g. roads, parking, schools, health services) cannot support these Greenbelt developments and absorb the population growth of thousands. Instead, they will have significant adverse effects.</li> <li>3 c) In practice the various sites will be linked on the eastern side of the Town to form a single entity in what is now open countryside, destroying environment, wildlife and habitats, as well as sacrificing the current lifestyle of residents and visitors. Also, and very importantly, the extra pollution will contribute to poorer air quality and climate change.</li> </ol>
Include files	
Number	Question 46
ID	LPIO14796
Full Name	Mr T Putman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Site Tr-h2 (land west of Marshcroft Lane)</p> <ol style="list-style-type: none"> <li>1 a) Proposals for this site and Tr-h1 in Station Road, taken together, will result in building on <b>both</b> sides of Marshcroft Lane. It will cause, both in the short term during construction and in the long term, destruction which far exceeds any benefit from development. To better understand this comment, (i) the appearance, use and nature of the location and (ii) the values of Marshcroft Lane to the Town and it's landscape need to be fully recognised.</li> <li>2 b) The site Assessment says that "primary access would be via Marshcroft Lane." This fails to emphasise that the <b>only</b> access is via the Grove Road/Marshcroft Lane junction and that Marshcroft Lane is a <b>cul de sac</b>. This point of access will be entirely impractical and unsafe, as the number of homes and traffic using the Lane would be <b>treble</b> in density and volume.</li> </ol>



3 c) Originally part of the ancient Pendley Estate, Marshcroft Lane is a mature, quiet, safe almost traffic free cul de sac on the very eastern edge of Tring, passing as a narrow lane (shown as a path on older maps) through open countryside. It is attractive in appearance with only **30** well maintained homes of varying ages and style, some of historical value.

(i) These homes are located in the **first** part of the lane which stretches for c.250 metres from the junction with Grove Road. Within 25m of entering the cul de sac, the Lane narrows for 50m and becomes wide enough for single vehicle only at that point. There is no scope for widening the road. It follows that extra traffic on this part of the lane would be entirely impractical and cause significant extra pollution with all the adverse climate change effect.

(ii) in the **second** part, immediately after the last home on each side of the Lane, the roadway narrows again to a path/single vehicle width and for c.750 m leads at that width through Greenbelt land to the Chiltern Area of Outstanding Natural Beauty via Marshcroft Bridge. This Bridge, built in 1805 on the Summit of the Grand Union Canal (the highest navigable waterway in England), takes users over the canal, along canal side walks and on towards the Ridgway National Trail and beyond. New houses will be visible from the Trail.

(iii) This Lane/path to the Bridge is framed by wide verges of bushes and wild flowers backed with mature trees and hedgerows. All along the hedgerows and the verges, ditches taking excess water from the fields lie on each side. The fields bordering the path are land of grade 2 (very good/high yield) quality. The entire area is renowned for its valuable wildlife and habitats of various kinds. Building would cause this natural environment to be **destroyed**.

1 d) In terms of value to the **Town**, both parts of the lane/path are used extensively for leisure and wellbeing purposes. Residents and visitors, families with children, children going to and from school, dog walkers, ramblers, athletes, joggers, cyclists, horse riders all use it because it is a safe, healthy area set in a beautiful landscape. It is the starting point for social events, competitions and charitable events. Each year the Ridgeway Runs are held along the Lane and the official "Grand Tour of Tring" route for ramblers recommends Marshcroft Lane as giving the best entry point for enjoying the countryside on this side of the Town.

2 e) This Lane and its unique surroundings, set as it is in an ancient Area of Archaeological Significance is irreplaceable as a benefit to residents of Tring and visitors to the town. It cannot be right that development along this lane/path causes all of this to be **destroyed**.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14797

Full Name	Mr T Putman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Site Tr-h1 (Land north of Station Road)</p> <p>1 a) As this site would sit alongside Tr-h2, most of my comments apply to issues for this Site too. In fact, the Appraisal for Station Road is cross refereed to Marshcroft Lane (Heading 8).</p> <p><b>(See comment LPIO14796 for comments - also below)</b></p> <p>1 b) I must however draw attention to Heading (3). To my knowledge, the fields <b>do</b> flood and the property named Ivy Cottage toward the end of Station Road has suffered from flood water from the fields over many years. That answer should be revisited in detail.</p> <p>2 c) My remarks are my answer to Question 46 of the Questionnaire ie my feedback on the analysis of the site Appraisals generally and for the above Sites in particular. I believe I have dealt fully with Headings, 1, 3, 4, 5, 6, 8, 9, 10, 11, 13 and the Objectives.</p> <p><b>LPIO14796 comments</b></p> <p>Site Tr-h2 (land west of Marshcroft Lane)</p> <p>1 a) Proposals for this site and Tr-h1 in Station Road, taken together, will result in building on <b>both</b> sides of Marshcroft Lane. It will cause, both in the short term during construction and in the long term, destruction which far exceeds any benefit form development. To better understand this comment, (i) the appearance, use and nature of the location and (ii) the values of Marshcroft Lane to the Town and it's landscape need to be fully recognised.</p> <p>2 b) The site Assessment says that "primary access would be via Marshcroft Lane." This fails to emphasise that the <b>only</b> access is via the Grove Road/Marshcroft Lane junction and that Marshcroft Lane is a <b>cul de sac</b>. This point of access will be entirely impractical and unsafe, as the number of homes and traffic using the Lane would be <b>treble</b> in density and volume.</p> <p>3 c) Originally part of the ancient Pendley Estate, Marshcroft Lane is a mature, quiet, safe almost traffic free cul de sac on the very eastern edge of Tring, passing as a narrow lane (shown as a path on older maps) through open countryside. It is attractive in appearance with only <b>30</b> well maintained homes of varying ages and style, some of historical value.</p> <p>(i) These homes are located in the <b>first</b> part of the lane which stretches for c.250 metres from the junction with</p>

Grove Road. Within 25m of entering the cul de sac, the Lane narrows for 50m and becomes wide enough for single vehicle only at that point. There is no scope for widening the road. It follows that extra traffic on this part of the lane would be entirely impractical and cause significant extra pollution with all the adverse climate change effect.

(ii) in the **second** part, immediately after the last home on each side of the Lane, the roadway narrows again to a path/single vehicle width and for c.750 m leads at that width through Greenbelt land to the Chiltern Area of Outstanding Natural Beauty via Marshcroft Bridge. This Bridge, built in 1805 on the Summit of the Grand Union Canal (the highest navigable waterway in England), takes users over the canal, along canal side walks and on towards the Ridgway National Trail and beyond. New houses will be visible form the Trail.

(iii) This Lane/path to the Bridge is framed by wide verges of bushes and wild flowers backed with mature trees and hedgerows. All along the hedgerows and the verges, ditches taking excess water from the fields lie on each side. The fields bordering the path are land of grade 2 (very good/high yield) quality. The entire area is renowned for its valuable wildlife and habitats of various kinds. Building would cause this natural environment to be **destroyed**.

- 1 d) In terms of value to the **Town**, both parts of the lane/path are used extensively for leisure and wellbeing purposes. Residents and visitors, families with children, children going to and from school, dog walkers, ramblers, athletes, joggers, cyclists, horse riders all use it because it is a safe, healthy area set in a beautiful landscape. It is the starting point for social events, competitions and charitable events. Each year the Ridgeway Runs are held along the Lane and the official "Grand Tour of Tring" route for ramblers recommends Marshcroft Lane as giving the best entry point for enjoying the countryside on this side of the Town.
- 2 e) This Lane and its unique surroundings, set as it is in an ancient Area of Archaeological Significance is irreplaceable as a benefit to residents of Tring and visitors to the town. It cannot be right that development along this lane/path causes all of this to be **destroyed**.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14798
<b>Full Name</b>	Mr T Putman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here	Finally, in the light of the above, I charge the Council to reject the <b>current Plans</b> and find more appropriate locations. In doing so, I ask for a new Plan that primarily reflects the Councils duty to act in the best interests of its <b>existing</b> residents (not simply potential residents only) in preserving the fabric and the values of its Town and countryside.
Include files	
Number	Question 46
ID	LPIO14818
Full Name	Steve Baker
Company / Organisation	CPRE - The Hertfordshire Society
Position	Planning Manager
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	No
Your response - Please add your response here	CPRE Herts has not commented on individual site appraisals at this stage of the new Local Plan consultation.
Include files	
Number	Question 46
ID	LPIO14865
Full Name	Bev Mckenna
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, please take this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</b></p> <p><b>In addition, I draw attention to some of the most important points within that response</b></p> <p>Q46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, building upon which entirely contradicts the concept of sustainable development.</p>

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-by-DBC-for-SM-Facsimile.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new development.
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density.

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt Boundary

- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station.
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm land
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town centre
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
    - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it.
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative



impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'

- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car.”

- Berkhamsted railway station and commuter line to Euston is already at full capacity.
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution.
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other land
- Site is part of the open transition area between the town and the wider countryside
- New building could set a precedent for further development of land southwards to the A41
- Site is too small to offer scope for additional town-wide leisure space

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling difficult

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase

to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns AONB
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges.

- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the

services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station.
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - Site falls within area of Archaeological significance
    - Adjacent to Chilterns AONB
    - Suggestion of potential new primary school – not part of Berkhamsted education policy
    - Lack of secondary school capacity – Ashlyns School
    - Same arguments on accessible housing – distance from facilities and services

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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- Site is insufficient on its own, but could be phased with other land
- Some distance from the town centre
- Next to the Chilterns AONb
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities



- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
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use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable

	<p>- too far for residents to walk to and from the town</p> <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14911
<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	No
<b>Your response - Please add your response here</b>	
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14912
<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Attached is Tring Town Council's response to the above consultation in the prescribed format. The following gives the rationale behind the Town Council's answers.</p> <p>It is vital to appreciate the geography and the consequential history of the Town. It is a small market town serving the local villages on the edge of the Chilterns; whilst in Hertfordshire, it is surrounded by Buckinghamshire. Until the development of Hemel Hempstead as a new town, the largest population centre was Aylesbury.</p> <p>The Place Strategy in Dacorum Borough Council's (DBC) Core Strategy summarises Tring today as:  <i>"Tring remains a successful compact market town surrounded by farmland and delivering a high quality of life and prosperity for its residents and business community. Its built and natural heritage has been retained and enhanced"</i>.</p> <p>It has achieved this because it has grown organically as its own entity through a very strong sense of identity; the town is a prime example of sustainable development. That sense of community was evidence during the preparation of Tring's Town plan:</p> <ul style="list-style-type: none"> <li>• Caring, generous people</li> <li>• Vibrant with lots of clubs and societies</li> <li>• Friendly – an outcome of a mystery shopping study in Tring</li> <li>• Inclusive – a good mix of all ages</li> <li>• Long term residents – the sense of belonging has been passed through the generations</li> </ul> <p>Hence perpetuating that sense of community is the Town Council's prime objective. To achieve this means that the following trends must be addressed:</p> <ul style="list-style-type: none"> <li>• The growth of internet shopping and the changing face of the High Street</li> <li>• A range of long established independent retailers have closed</li> <li>• The Town's last bank will close in June 2018</li> <li>• The edge-of-town supermarket has drawn shoppers away from the Town centre <ul style="list-style-type: none"> <li>• Recognising that the growth of car transport is unsustainable</li> </ul> </li> <li>• Streets are clogged as practically every household has at least two cars</li> <li>• There is a lack of town centre car parking</li> <li>• Despite a large extension there is insufficient car parking at Tring Station</li> <li>• Traffic in the High Street frequently grinds to a halt through deliveries and buses (It is testament to the patience of Tring residents how stoically this is accepted) <ul style="list-style-type: none"> <li>• The growth in house prices</li> </ul> </li> <li>• is pushing away young families and threatening to unbalance the population</li> <li>• with the change in permitted rights, employment land is being lost (even within a designated General Employment Area) to residential development where the best profit is to be had</li> </ul>

- Caring for an ageing population, especially those suffering with dementia
- Protect the environment
- Utilise the eco-friendly techniques available to reduce energy usage, emissions, water consumption
- Protect the natural habitat

The Town Council has, and is, trying to do what it can given its limited powers to tackle these issues:

- It has worked to promote tourism, supporting the 'Enjoy Dacorum' and 'Visit Herts' initiatives
- It is a transition town and a fairtrade town
- It is working to achieve dementia-friendly status
- It is working with DBC to provide social housing
- It has funded the creation of the Tring Retail Forum and jobs shows in Tring

But to have significant success Tring needs DBC through the Single Local Plan to acknowledge and embrace these issues. Any growth in Tring must be on a sustainable basis address i.e.

- Integrate with the existing community
- Be accompanied by the necessary infrastructure – education, health, transport, etc.
- Retain Tring's market town character
- Protect the countryside

These requirements mirror the adopted Core Strategy's Policy for the Distribution of Development CS1:

*"The market towns will accommodate new development for housing, employment and other uses, provided it:*

- 1 *is of a scale commensurate with the size of the settlement and the range of local services and facilities;*
- 2 *helps maintain the vitality and viability of the settlement and the surrounding countryside;*
- 3 *causes no damage to the existing character of the settlement or its adjoining countryside; and*
- 4 *is compatible with policies protecting the Green Belt and Rural Area"*

It must not be forgotten when looking at these points, that Tring is already taking 500 houses under the adopted Site Allocations. This alone will place the existing infrastructure under pressure.

Tring Town Council is looking for:

- Provision for local employment. This will give vitality to the community; boost the economy; engender involvement in the community and minimise travel to work. The employment provided must suit the local needs:
- There are over 900 registered companies in Tring – these are predominately very small. Hence the need is for small units/offices to which these home businesses can migrate and grow
- The local secondary school – the second largest in the county – is an excellent source of potentially skilled labour
- The need for commercial development is recognised in the draft Local Plan. Warehousing would be inappropriate:

- It is land hungry
- Generates low levels of employment
- Is inappropriate to the gateway site (see below)
- Provide 'affordable housing' that is truly affordable for young families and key workers in order to achieve the right balance within the population and to attract or retain public sector employees e.g. teachers and social workers:
- Social rented housing
- Shared-ownership including key worker schemes
- Starter homes
  - Effective alternatives to using the car. Hertfordshire's draft Local Transport Plan highlights a fundamental shift in policy with "A move away from a focus on car based investment and capacity enhancement. These are now seen as a last resort".
  - Quality housing developments. Take the opportunity to incorporate:
- Environmentally-friendly building features that exceed minimum standards
- Access to sustainable forms of transport
- A mix of housing types
- The minimal impact on the countryside especially the Chilterns A.O.N.B.
  - In addition to the infrastructure mentioned above, more sports facilities to remove the existing deficit and cater for the growing demand.

Finally, consideration of the housing need that can be accommodated in Tring, whilst meeting the criteria set out in Policy CS1, and throughout Dacorum.

The extend of protected land – Green Belt and the Chilterns A.O.N.B. – and the rightful application of Policy CS1 preclude anything beyond a modest contribution from the market towns, larger villages and rural areas. The existing allocations under the Site Allocations document take up that capacity already.

This would point to the lowest level of housing provision included in the consultation options as being the most likely to be achievable on a sustainable basis. The ability to absorb higher levels of housing growth is dependent upon the extra houses being taken solely by Hemel Hempstead.

The level of housing growth that can be accommodated in Tring, over and above the 500 dwellings already allocated, is the number that can be accommodated on Tr-h5 having firstly made the necessary provision for employment, sports facilities and open space whilst protecting the gateway to Tring and the setting of the A.O.N.B. The figure of 300 would appear to be of the right order.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14913

<b>Full Name</b>	Mr Michael Curry
<b>Company / Organisation</b>	Tring Town Council
<b>Position</b>	Town Clerk
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Town Council considers that this can be achieved by a mixed development on site Tr-h5 Dunsley Farm.</p> <ul style="list-style-type: none"> <li>• It is a large site offering mixed use:</li> <li>• Employment land</li> <li>• Sports facilities (adjacent to existing facilities)</li> <li>• Housing <ul style="list-style-type: none"> <li>• It is the site with the least impact on the A.O.N.B. The Green Belt assessment was "Part of the site is identified as less constrained and the area is recommended for further assessment"</li> <li>• It is closest to the town centre. This will make the task of integrating the growth with the existing community as easy as possible</li> <li>• It is a 'constrained' site with a natural boundary</li> <li>• It is a Town 'Gateway' so will need sympathetic development</li> </ul> </li> </ul> <p>How much land is need for each application is not clear yet, but looking at an illustration of the possibilities based on Option 1A, a mixed development might look like:</p> <ul style="list-style-type: none"> <li>• 10 hectares allocated to housing (at 30 dwellings per hectare)</li> <li>• The Brewery, Farm shop, etc. take up less than 1 hectare</li> <li>• 15 hectares for sports facilities (based on Tring Sports Forum's response anticipated need)</li> <li>• Employment – 7 hectares</li> <li>• Open Space – 4 hectares</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO14968
<b>Full Name</b>	Malcolm and Jill Allen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation.

To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.

However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.

Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-Header-DEC-2014-1-1.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet



the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its

attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult

- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that

bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site

- Development of site threatens ancient woodland (Long Green), while environmental policies suggest

this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre

on other side of A41 – increasing car journeys even more

- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
  
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway



bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the

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- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of ‘bus loop’ therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling

etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
- Close to Northchurch AQMA

- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
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- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage

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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14970
<b>Full Name</b>	Malcolm and Jill Allen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues & Options' consultation. To avoid full repetition of the extensive points made in

the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.

However, I/we would like to take this opportunity emphasize just a few of the most important points within that response.

Brownfield sites must have priority. Higher density development should be allowed in Hemel. Sites capable of very large scale development over a numbers of years should not be ignored – including the possibility of a properly planned new Garden Town. **Some residential use could be made of the Industrial Estate which has access to the A41.**

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Analysis-of-the-Green-Belt-Review-Header-DEC-2014-Final.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area

that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There



are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a

lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions

- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of

Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a

junction with The Common at a point near to a hazardous

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site.



We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
    - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
    - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
      - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
    - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated

- Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt
- 
- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
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- Located in Berkhamsted Conservation Area
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  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in

	<p>Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</p> <ul style="list-style-type: none"> <li>• Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> <li>• facilities and services not accessible</li> </ul> </li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town <ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> </ul> </li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO14999
<b>Full Name</b>	Colin Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I object to the 225 new homes proposed on Green Belt land between Bell Lane and Darrs Lane.</b></p> <p>The Please Take Action! leaflet requests a response to the following:-</p>

	<p><a href="https://dacorum-consult.objective.co.uk/portal/planning/lp/io/">https://dacorum-consult.objective.co.uk/portal/planning/lp/io/</a></p> <p>Please accept my objection or tell me where I can simply lodge my objection. Thank you.</p> <p><i>I object to Dacorum Borough Council planning to build 255 houses on Green Belt Land between Bell Lane and Darrs Lane, Northchurch, Berkhamsted, Hertfordshire</i></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15018
<b>Full Name</b>	Mr Clive Freestone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. However, I would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p>

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/03/BRAG-Analysis-of-the-Green-Belt-Review-for-the-Dacorum-SMVA-imp.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This



approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present

Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the

hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or

business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town

- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents

would walk to and from the town on any pathway provided highly unlikely

- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such

as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance



- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance

- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment

- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
    - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten

	minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15066
<b>Full Name</b>	Mr & Mrs D A Simmons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. We request you accept this summary as confirmation that we wish DBC to duplicate BRAG's responses under our names.</p> <p>We would like to take this opportunity to emphasize a few of the most important points within that response, <b><i>in particular our response to Q25.</i></b></p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt</p>

affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see

<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/04/BRAG-Analysis-of-Green-Belt-Review-for-the-DBC-SM-Facsimile.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of

Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the



built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider

community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some

form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
    - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions

- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
    - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
  - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
    - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
    - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes,

blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top

- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community
    - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
    - Site of archaeological significance
    - Not recommended for removal from Green Belt

- o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted

- Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
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<b>ID</b>	LPIO15071
<b>Full Name</b>	Tom Simmons
<b>Company / Organisation</b>	St William Homes LLP
<b>Position</b>	Development Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>St William have an interest in the former Gasworks located off London Road, Hemel Hempstead within the Two Waters Strategic Framework Area.</p> <p>The site, in its entirety, is identified as part of a larger housing allocation (H/2) in the adopted Site Allocations 2006 – 2031 Development Plan Document (DPD) (July 2017). H/2 – <i>National Grid and 339 – 353 London Road, Hemel Hempstead</i> is allocated for 350 homes and covers 4.3 ha in total. The land in which St William have an interest covers 3.82 ha (89%) of the allocated site.</p> <p>It is considered that the site has the capacity to accommodate in excess of 450 homes and that delivery can commence within 5 years. As such, St William would welcome the opportunity to discuss the future of this site with you in further detail as the New Local Plan is developed.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15092
<b>Full Name</b>	Grand Union Investments
<b>Company / Organisation</b>	Grand Union Investments C/O Savills
<b>Position</b>	Associate Director
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Grand Union Investments is the owner of land lying to the south of Berkhamsted, which is identified as a potential site allocation in the 'Issues and Options' document. Grand Union Investments are supportive of the potential allocation and wish to work with the Council to deliver the proposal. These representations are therefore focussed on the Grand Union Investments land interest, whilst also addressing wider issues with the intention of ensuring that the Local Plan is sound in accordance with NPPF paragraph 182.</p>

	The Council will be aware that land to the south of Berkhamsted was promoted for development within the context of the now adopted Core Strategy. The site is now being promoted 'afresh' within the context of the Council's newly emerging Local Plan and these representations form the latest stage of our client's engagement with that process.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15116
<b>Full Name</b>	Mr Paul Esom
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Traffic !!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15117
<b>Full Name</b>	Mr John Beach
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I refer to the above local plan covering proposed development of new housing in the locality and, how this will affect the village of Bovingdon.  As the village is at present, the infrastructure is barely sufficient to sustain the village. The local school cannot take all the children that should go there, and, in consequence, they are having to be bussed to other localities. The Doctors and Surgeries are barely enough to cope with present demand with wait times for appointments being very high. The provision of Gas and Electricity with BT telephone services, together with water, sewerage and drainage service trucks on local roads This can only get worse.  The natural environment is already under pressure with underground water levels, even at this time of the year, being at a very low level and this will only get worse as humanity interferes This willmean water rationing throughout the year not just summer time.

	<p>Traffic is going to increase which will have a dramatic and disastrous effect on journey times and in pollution levels The local village roads presently, are at peak capacity at certain times of the day and night with not only local people trying to go about their business but also with 'through' traffic making its way to Chesham, Hemel Hempstead &amp; Chipperfield and beyond This traffic also contains large lorries Th eproposed new Tesco branch in the centre will exacerbate the problem as soon as construction starts, and this will cointinue as the branch starts to trade no matter what traffic solutions are put in place. This development should never have been allowed The present village population should be able to enjoy the areas of green that have been saved from development by our forefathers as should all other communities with their green belt land.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15119
<b>Full Name</b>	Mr John Beach
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Whilst some development of Bovington will become necessary and desirable over time what is now being proposed is completely wrong. The building of any new homes should only be contemplated after action has been taken to solve the overcrowded High Street, make more provision within our local school to accomodate our children, expand our medical facilities and provide parking which is badly needed and increase all services</p> <p>The four sites being considered in Bovington are completely unsuitable through over density and Councillor's and Town Planners should remove them from the plan. This proposed housing plan will ensure the environment is ruined for all including any new resident and will spoil the character of teh village.</p> <p>We would ask all Councillors of both Parish and Dacorum to vote against this development and protect nature.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15122
<b>Full Name</b>	Ena Hartland
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am unhappy with the proposals referred to in the draft plan as HH-h1a, HH-h1b and HH-h2 as these would destroy the treasured aspect of Piccotts End as a Conservation Area.</p> <p>While acknowledging that there is a desperate shortage of homes in the country as a whole and I presume in Dacorum also - (how many families are currently on your housing list?) I would urge the Planning Committee to take every possible measure to avoid using areas presently designated as Green Belt to build new homes- an irreversible decision.</p> <p>In addition, the traffic hold ups on the Leighton Buzzard Road at busy times are already severe - what plans are there to deal with this problem? I am also extremely concerned that the remains of teh Roman Baths in the field at the bottom of Galley should not be affected IN ANY WAY, This is a national treasure which we should be proud of!</p> <p>There is also concern of the effect of building inthe area close to the River Gade - at its worst, drying up of the river or at the very least a significant lowering of water level with a consequent effect on wild life, including water otters, a protected species.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15123
<b>Full Name</b>	Nicola Withers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am aware of the above proposal and i consider the effect of the proposals listed for Tring will have a devastating effect on what is a small historic market town in the Chilterns surrounded by the Chiltern Area of Outstanding Natural Beauty in addition to protected Green Belt land.</p> <p>The town is not equipped for any major new development and DBC should maintain the Green Belt, as is their obligation, and the character of Tring Town and the surrounding area.</p> <p>Tring already struggles with the lack of hard and social infrastructure e.g traffic congestion through the narrow roads, lack of parking in the Town and the railway station, inadequate transport links, schools, doctors surgeries and the like. How is it going to cope with major development? How much of this development and the</p>

	<p>promises of improvement therein can DBC actually directly control and deliver?</p> <p>The proposals are insensitive and reckless adding to urban sprawl in a Town ill equipped to cope.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15124
<b>Full Name</b>	Nicola Withers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	DBC should look at other towns far better equipped and which have been designed and planned to cope with expansion e.g Hemel Hempstead
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15125
<b>Full Name</b>	Nicola Withers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am strongly opposed to the inclusion of site reference Tr-h5 - Land at Dunsley Farm, Tring for the following reasons:</p> <ul style="list-style-type: none"> <li>- It is adjacent to Chiltern Area of Outstanding Natural Beauty</li> <li>- It is Green Belt providing a green corridor/buffer into town</li> <li>- It is the gateway site and visual opening to Tring town from the main access of A41</li> <li>- The site was overwhelmingly rejected for development last time</li> <li>- The development will be unwanted urban sprawl</li> <li>- If the existing petrol filling and Tesco supermarket are maintained Tring has no need for further</li> <li>- Development of these fields with their established and mature hedgerow supporting a variety of wildlife will be a tragic loss</li> <li>- Development can only add further to traffic congestion and pollution making the A41 more akin to a motorway and Cow Lane requiring rebuilding</li> </ul>



	<ul style="list-style-type: none"> <li>- No plans are apparent for changes and improvements to the hard and social infrastructure of the Town e.g. schools, doctors surgeries, buses, car parking, Tring station</li> <li>- It will be another loss if valuable and viable farmland</li> <li>- It will be loss of a designated wildlife site</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15143
<b>Full Name</b>	Simon Foster Monique Bos
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The growth options being considered by the Council allocate proportionately too much housing to the settlement of Tring. The Council should distribute a higher proportion of housing growth to Berkhamsted and Hemel Hempstead which are larger settlements and more able to absorb new housing. The Council should also allocate sufficient housing to the rural settlements of Marsworth, Wiggington, Aldbury, Cow Roast, Chipperfield, and Flamstead, as they also have a need for new homes that should be addressed. The Council should also seek to deliver any new housing growth through the release of smaller sites rather than a limited number of very large allocations.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15144
<b>Full Name</b>	Simon Foster Monique Bos
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>For the reasons set out in this Statement, we do not consider that it would be appropriate to allocate land at Dunsley Farm in Tring (Site Reference TR-H5) in the emerging Local Plan. In summary, the land should not be allocated for the following reasons.</p> <p>Wiggington, Aldbury, Cow Roast, Chipperfield, and Flamstead, as they also have a need for new homes that should be addressed. The Council should also seek to deliver any new housing growth through the release</p>

of smaller sites rather than a limited number of very large allocations.

The site at Dunsley Farm in Tring is in a sensitive location and subject to a number of designations, which indicate that the land is not suitable for the scale of development proposed, including the following:-

- Is in the Green Belt where there is a presumption against *'inappropriate development'*. Industrial/warehouse development and housing are defined as inappropriate development and should not be permitted unless 'very special circumstances'
- Is in an area of acknowledged 'Landscape Sensitivity'. The site is directly adjacent to the Chilterns Area of Outstanding Natural Beauty and would result in harm to a protected and valued landscape, which is contrary to Paragraph 11 of the National Planning Policy Framework. Paragraph 115 of the National Planning Policy Framework states that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.
- The development of the Dunsley Farm site would harm the *"intrinsic character and beauty of the Countryside"*, which is contrary to paragraph 17 of the National Planning Policy Framework.
- The site is adjacent to Pendley Manor which is a Listed Building and has a Locally Registered Park and The development of the site would affect the setting of these heritage assets and this is unacceptable having regard to Section 12 of the National Planning Policy Framework which relates to the conservation of the historic environment.
- Contains a Local Wildlife Site and no details are provided as to how this would be mitigated from the proposed development. The Sustainability Appraisal also states that in respect of biodiversity, the allocation would result in the loss of natural habitats. The development of the site is not considered to be acceptable having regard to section 11 of the National Planning Policy Framework, which relates to the conservation of the natural environment.

The consultation document sets out a number of suggested principles that should be used when choosing new growth locations. However, the proposed site at Dunsley Farm in Tring does not comply with these locational principles. We conclude, therefore, that it is not an appropriate location for growth, as set out in the table below.

#### **Locational Principles**

#### **Assessment in relation to proposed allocation at Dunsley Farm in Tring**

#### **Does proposed allocation comply with Locational Principle?**

Maximise the use of brownfield land for development

The site comprises of greenfield (not previously developed) land

No

Support urban regeneration – particularly of Hemel Hempstead new town

The provision of housing and employment on this rural site will direct growth away from the settlement of Hemel Hempstead and will make it harder to regenerate the town

No

Locate development at well-connected sustainable locations

There are much more accessible locations in the Borough. The site is not within walking distance of Tring Station

No

Avoid areas at high risk of flooding

The site is in a low flood zone

Yes

Respect the character of the existing settlement pattern and restrict urban sprawl

The allocation of such a large site on the edge of the existing built up area of Tring, including 5 hectares of industrial and warehouse development, will result in urban sprawl into the countryside and will not respect the local character of the settlement.

No

Protect the character and value of important landscapes, heritage and biodiversity

The development would result in harm to many important designations

No

Ensure that new development can be served by necessary infrastructure

Existing infrastructure (schools and healthcare) is already at capacity and no new infrastructure is proposed

No

Finally, the site is not a suitable location for industrial and warehouse development. The only other locations being proposed by the Council for such development are at Two Waters in Hemel Hempstead and at Maylands Gateway. These are locations where one would expect industrial development to be located, they are very

	different in character to land at Dunsley Farm in Tring. The provision of industrial and warehouse development at Dunsley Farm would harm the natural beauty and rural nature of the land.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15156
<b>Full Name</b>	Mr David Broadley
<b>Company / Organisation</b>	Aylesbury Vale District Council
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Exhibition Boards - What key site options are we considering in Tring?</b></p> <p>Site Tr-h6 – Land north of Icknield Way (Waterside Way) – AVDC is concerned that taking forward this site option could lead to setting a precedent for development on the north side of Icknield Way which given openness of the landscape and topography with land falling to the north could have an adverse landscape and visual impact across the landscape of Aylesbury Vale.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15158
<b>Full Name</b>	Ms Tracy Puttock
<b>Company / Organisation</b>	Ashill Land Ltd
<b>Position</b>	Planning Manager
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing on behalf of our clients, Ashill Land Ltd, in respect of the current Local Plan consultation, specifically in respect to their land interest at Button House, Pix Farm Lane, Hemel Hempstead.</p> <p>This site, a demolition contractor's yard with associated buildings, comprises previously developed land in the Green Belt totalling 2.2Ha. Our client has recently had pre-application discussions with planning officers for proposals that involve the residential redevelopment of the site to provide 58 new homes. Additional details of the site have been submitted in response to the Council's Call for sites and brownfield land register. The site has previously been assessed by the Council as part of the 2016 SHLAA where it was highlighted as an 'urban' site within the Green Belt capable of delivering between 48 and 56 new homes (ref: BOV/11).</p>

	<p>In this context, our comments relate to the Council's proposed spatial strategy for the delivery of new housing as well as the proposed housing target itself (Questions 11 and 16).</p> <p>I trust that these comments will be taken into account by the Council in the preparation of the next stage of the Local Plan. In the meantime, should you have any queries then please do not hesitate to contact me.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15161
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing in respect of the proposals to build potentially 2500 plus new homes in Tring.</p> <p>Whilst I recognise that some new housing is needed in Tring , and that quotas may be imposed by central government, I have some very major concerns as follows :-</p> <p><b>General Scale of Development</b></p> <ol style="list-style-type: none"> <li>1 With potentially close to 3000 homes proposed in the worst case scenario, this would completely dwarf the scale of Tring, which has less than 5000 existing homes.</li> <li>2 The secondary school , which is an academy, is full. Any further education provision has the potential to require schoolchildren to be bussed or driven to other schools in the area. The fact that Tring School is no longer under the Herts Education Authority means that they cannot be made to expand or take more pupils, leading to the risk of increased road traffic.</li> <li>3 Central Tring itself has a very poor road layout, based originally on Victorian road layouts and lanes. Traffic chaos often occurs if a delivery takes place anywhere in Tring High Street at peak times due to its very narrow width. The roads which link to central Tring (eg Frogmore Street, Miswell Lane, Brook Street, Akeman Street) all have very narrow sections which rely on drivers giving way and are effectively one way traffic. Central Tring cannot cope with a significant increase in Traffic. There is no scope to widen or improve the traffic flows unless substantial one way systems were to be introduced, and very widescale restrictions on car parking on the roads in a Victorian town which has no scope for parking elsewhere for the residents.</li> <li>4 Tring Station Car Park is often overflowing. It is often not possible to park there on weekdays after mid morning. More homes would mean more</li> </ol>

	<p>commuters from Tring and hence the car park would become full much earlier, so a solution to this is fundamental to any development going ahead. However, the station car park is in an AONB, so cannot just be expanded.</p> <p>5 The proposed developments all take up very large swathes of green belt land. Whilst the developers and planners say that other areas can be designated Green Belt in their place, this is a fundamental principle at stake. The landowners and developers who have bought Green Belt land at agricultural rates (when Green Belt was more sacrosanct) now stand to make a great deal of profit for themselves. It will also open the floodgates for further land speculation and development if the principle of de- classifying large swathes of Green Belt is allowed to go ahead. There have to be some clear principles invoked and very clear guidelines and rules on when Green Belt can stop being Green belt. Not just to suit which developer puts plans forward for any area of land that they happen to own. It must also not lead to creeping development.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15162
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Specific Comments on the different areas :-</p> <p><u>Tr-h1 – North of Station Road</u></p> <p>I was a founder member of Tring Cycling Campaign in the early 1990's, and was heavily involved in lobbying for and successfully getting the Cycle Path to Tring Station, on what was and is a very dark and treacherous section of road.</p> <p>At that time, there was a very strong view that there should be no lighting along that stretch of road, and that it was absolutely imperative that the rural break should be maintained between the outskirts of Tring and Tring Station. In addition, in the intervening 25 years, the drainage of this stretch of road has never been successfully sorted out, with significant flooding when there is heavy rainfall, leading to pedestrians and cyclists getting drenched by passing cars. The well used footpath and cycle path to the station is very narrow in places and is very poorly maintained. It is also a dangerous stretch of road, with fairly regular accidents at the Station Road / Cow Lane crossroads. Adding up to 1000 (or even any) additional homes in this area, which would</p>

	<p>require cars to cross the cycle lane and footpath for access and egress, would have a major negative effect.</p> <p>Cyclists commuting to and from Tring Station would be extremely vulnerable on dark mornings and evenings, as they often travel at reasonable speeds and would be unable to stop if cars were coming in and out of this development.</p> <p>In addition, Tring Station would effectively become a part of Tring, and the opening up of part of this large area would inevitably lead to creeping development, again to the benefit of land speculators, as further Green Belt areas became de-classified to the north.</p> <p>Building of houses over a period of nearly two decades would lead to massive disruption on a road which is totally unsuitable for the movement of large numbers of HGV's and which is extremely hazardous in its current form.</p> <p>This area is furthest from the centre of Tring and is likely to lead to a significant increase in car use into Tring.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15163
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Specific Comments on the different areas ;</p> <p><b><u>Tr-h2 – Land West of Marshcroft Lane &amp; Tr-h3 – Land at Icknield Way / Grove Road (New Mill).</u></b></p> <p>Whilst these are areas of Green Belt, they look to impinge less on the overall expansion of Tring, and whilst the roads which access them are not suitable for significant amounts of extra traffic, I would have less objections to some development of these areas.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15164
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Specific Comments on the different areas ;

	<b><u>Tr-h4 – Land at Cow Lane / Station Road</u></b> This is a smaller scale infill, and whilst it is located at a dangerous junction, because it is South of Station Road, I would see fewer hazards and disruption in the construction and subsequent use of this area for housing development.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15165
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Specific Comments on the different areas ; <b><u>Tr-h5 – Land at Dunsley Farm/London Road.</u></b> Although this area provides a rural feeling route into Tring, out of all the options for large numbers of dwellings, I see this as having the least negative impact on Tring for the following reasons :- <ul style="list-style-type: none"> <li>• The land is currently farmers fields, and as such would lend itself to a phased development.</li> <li>• The land can be accessed straight off the A41 by construction traffic and the future homeowners without the need to travel through Tring or the unsuitable roads around Tring</li> <li>• I would hope that because this land is owned by Hertfordshire County Council, that they will use their ownership and influence to ensure that any development provides truly affordable housing, and is not just done for the benefit of land speculators, property developers and absentee landlords</li> <li>• It would be essential that a wide belt of trees and screening is put in place between the roads and any development.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15166
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Specific Comments on the different areas ;



	<p><b><u>TRh6 – Land North of Icknield Way.</u></b></p> <p>This land is on a large area which is visible from the north side of Tring. Any development here would have the significant risk that the development would continue creeping westwards to put an end to the rural Northern boundary to Tring forever.</p> <p>It is also the worst place for access to Tring Station, as cars would use the narrow roads to get across Tring to Station Road.</p> <p>There have been several attempts in the past to develop this area. It has led to much local opposition, which has successfully prevented this development on an escarpment. In my view it is unacceptable just to sweep away any previous consultations and challenges to</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15167
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ol style="list-style-type: none"> <li>1 I believe that many of the proposed developments are totally unacceptable and unsuitable for reasons outlined above.</li> <li>2 I believe that the Tr-h1 and Tr-h6 should not be allowed to go ahead in any form whatsoever, as they break completely outside the natural boundaries of Tring.</li> <li>3</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15170
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ol style="list-style-type: none"> <li>1 If there is a significant increase in housing, then a huge effort needs to be made to discourage car use, by the provision of high quality walking and cycling routes to and from the centre of town, the sports grounds and facilities and Tring Station. There also needs to be a significant improvement</li> </ol>

	<p>in public transport to and from Tring from the adjacent towns and Tring Station</p> <ol style="list-style-type: none"> <li>2 All the usual aspects of schools, doctors, drainage, sewerage , infrastructure, on street parking etc must be considered well in advance.</li> <li>3 The Hospitals in Watford and Stoke Mandeville can barely cope with the pressures of increasing housing development in Bucks and Herts, and this has to be addressed before any large scale developments in Dacorum.</li> <li>4 Any money flowing from any Section 106 agreements should be spent on improvements in Tring. Previously money gained from Section 106 agreements within Tring have been taken by Dacorum BC and used for schemes in Hemel Hempstead 9I have no local political affiliations, but a strong sense of what is morally right).</li> <li>5 For Tring’s narrow streets to function with a potential very large increase in car ownership and usage, a lot of thought has to be given to parking provision for existing residents, town centre car parking and Tring Station Car Parking, all of which are often unacceptable now.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15190
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p><b>Answer – YES</b></p> <p>I am strongly opposed to the site reference Tr-h5 – Land at Dunsley Farm, London Road, Tring.</p> <ul style="list-style-type: none"> <li>• This Green Belt land is bordered by the Chilterns Area of Outstanding Natural Beauty [AONB] that lies to the south of London Road and east of Cow</li> <li>• The Cow Lane and Dunsley Farms provide an invaluable green gateway to/from the market town of Tring. This is an extremely valuable and unique feature of the Town and to destroy it would be an act of vandalism. A very large number of local residents have the enjoyment of this rural aspect regularly and visitors often remark on the outstanding beauty of the scenery as they enter Tring from the east. There are very few towns in the northern Home Counties (if any) that can boast a landscape as attractive. The “Vision” section of the Local Plan states <i>“the natural beauty of the Chiltern Hills and varied character of the countryside is admired and cherished “</i>The</li> </ul>

objectives of the Plan include statements such as “to protect and enhance Dacorum’s distinctive landscape character” and “safeguard the countryside and attractive landscape from development” It is undisputed that the eastern entrance of Tring would be identified as one of the most attractive landscapes within Dacorum and, as such, must be preserved at all costs. Not to do so makes nonsense of the much-stated objectives of this and previous planning documents about the preservation of the Borough’s outstanding scenery locations.

- Spreading the development of Tring eastwards along the line of London Road/A4251 towards Cow Roast/Dudswell/Northchurch/Berkhamsted is akin to a form of Ribbon Development and amounts to urban sprawl. The suggestion that travel communication would be improved and journey times reduced by building adjacent to an arterial road is long dis-credited. Development of this type is undesirable for many widely known reasons – not least because it produces congestion, unsafe traffic conditions and ugly countryside. Green Belt policies were developed more than 60 years’ ago to specifically to stop this type of urban sprawl.
- ‘Exceptional circumstances’ have to be proven to change Green Belt boundaries – and there is no evidence that such circumstances exist to justify re-designating the Dunsley Farm site.
- Very substantial housing development has taken place recently around Aylesbury and much more is planned. Huge housing and infrastructure developments are taking place to the east of the town {i.e. towards Tring} with 2450 new homes in Broughton and 3000 in Weston Turville. A substantial proportion of this housing is designated affordable. Both of these plus other smaller projects are adjacent or very near to the A41. Given, therefore, that into the future there will be much less open countryside between Tring and Aylesbury it is imperative that the current open spaces to the east of Tring are not encroached upon. There is a great danger of having an A41 corridor that is a continuous network of urban communities. This would be disastrous for Tring and its neighbouring communities.
- Dunsley Farm is a totally unsuitable site for additional small and medium sized industrial and warehouse units. The location is in close proximity to the market town of Tring and more than 12 acres of industry would have a disastrous effect on the rural green eastern entrance to the Town. The extra traffic generated would cause unacceptably high commercial vehicle and heavy lorry movements causing congestion, unsafe road conditions and pollution. Green Belt land can only be re- designated if exceptional conditions apply. It is inconceivable that such conditions apply in this case.
- The proposed development is highly visible. It would, if developed, represent a vast sprawling eyesore to many residents and visitors alike.

- The proposed site is very close to the A41 – and would eliminate the important buffer between the busy main roads and existing built up areas of the Town.
- There is no requirement for an additional petrol filling station and supermarket in Tring. Again it is impossible to imagine the justification for the ‘exceptional circumstances’ required to use Green Belt land for these purposes.
- Valuable farmland would be lost [Two active livestock farms occupy the site – the land has been misleadingly described as “Open Fields” in the document]. There are hardly any livestock farms close to Tring town whereas there are many less productive open fields much less economically utilised and with far less landscape issues. The farming sector will undergo great change when Britain leaves the European Union and productive fertile farmland will be required to be an even greater national asset.
- The area includes a valuable grassland Local Wildlife Site that must be preserved. As testament to the success of this site in supporting local wildlife - to my knowledge over fifty species of wild birds have visited the household gardens adjacent to this site. The National Planning Policy Framework states that the conservation of wildlife heritage is an important consideration and should be given great weight in Areas of Outstanding Natural Beauty. Building on these farm meadows and pastures would result in the loss of irreplaceable natural asset.
- The area includes a valuable grassland Local Wildlife Site that must be preserved. As testament to the success of this site in supporting local wildlife - to my knowledge over fifty species of wild birds have visited the household gardens adjacent to this site. The National Planning Policy Framework states that the conservation of wildlife heritage is an important consideration and should be given great weight in Areas of Outstanding Natural Beauty. Building on these farm meadows and pastures would result in the loss of irreplaceable natural habitats.
- The Wildlife Site exhibits the Ridge and Furrow archaeological pattern of ploughing created by the ridges and troughs used by farmers in the Middle Ages. This method was used up to the 17th Century and meadows that still possess this feature have not been ploughed since then. This ripple effect is particularly noticeable following snowfalls – see photo attached.
- Walkers, many with dogs, use the Tring Town footpath crossing Cow Lane Farm extensively for countryside exercise.
- The site is sandwiched between, and would impact upon, Tring Park and Pendley Manor – both highly important open space locations.
- Use of this site for housing, industrial units, warehouses etc. would negate its potential future use for a new (secondary) School with adjacent

	<p>playing fields and/or additional Sports facilities for the Town.</p> <ul style="list-style-type: none"> <li>• A site should not be chosen primarily on the grounds of ease of development or influenced by who owns the land. First and foremost a site should be chosen for its suitability.</li> <li>• In the consultation process for the Emerging Core Strategy in 2009 there was overwhelming opposition to the development of the Cow Lane Farm/Dunsley Farm site. There were more Core Strategy responses from the small town of Tring than for Hemel Hempstead, Bovingdon, Kings Langley, Markyate and Countryside combined.</li> <li>• Over 95% of respondents to the question “<i>Do you prefer the Dunsley Farm option for development</i>” answered No – only 17 in favour but 337 against. For this site to be included in the latest options when so many residents and visitors considered its development would be severely damaging to the character of Tring town makes one conclude that the strongly held views expressed by so many are over time simply dismissed as unimportant or irrelevant. It is unsurprising that ordinary people are disillusioned with the consultation process conducted by Local Government when their voices are blatantly ignored.</li> </ul>
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo 1</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15191
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>Shown (attached) below are views of the Dunsley Farm site looking southwards toward Wigginton and The Ridgeway National Trail on the escarpment i.e. viewed towards part of the Chilterns Area Of Outstanding Natural Beauty.</p> <p>This total potential development site comprises some ninety-two acres incorporating a large supermarket, a petrol filling station, twelve acres of industry/warehouses and a very substantial housing development. For the development of this area to have an assessment of only MEDIUM impact on the landscape is incomprehensible – and totally bewildering. There needs to be a full independent review of this conclusion.</p> <p>The two Cow Lane Farm meadows and pastures in the foreground are part of the potential development site. They are used for grazing cattle. They form part of an important grasslands Local Wildlife Site.</p>

	This irreplaceable landscape is extremely precious and we have a responsibility to preserve it intact for current and future generations.
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo 2</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15192
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>Shown (Attached) is a view across Dunsley Farm looking North East towards Ashridge and Ivingoe Beacon. For development on this ninety-two acre site to be labelled a "Medium" impact on the local landscape beggars belief.</p>
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo 3</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15193
<b>Full Name</b>	Bert Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>The Attached document shows part of Dunsley Farm viewed from the South and also aerial image of Tring identifying the area Dunsley Farm.</p> <p>The Dunsley Farm site remains the only significant tract of green countryside close to the Town Centre and is adjacent to Tring Park {one of the County's most important ecological sites} on one side and Pendley Manor on the other. To extend the town's development into this scenic green wedge of farmland, woodland and grassland would be catastrophic for the Town and its unique character. It is a vast area relative to the size of the Town.</p> <p>It is nonsense to suggest that the infrastructure implications of a site cannot be properly assessed until that site has been chosen. Its effect on the community is a fundamental component in the choice of a potential site.</p>

In the case of Tr-h5 there are the following to be considered:

- Cow Lane is currently wholly inadequate and unsafe. The prospect of a huge increase in traffic movement is unimaginable.
- A high increase in cars and commercial traffic {including lorries} in London Road will cause much higher congestion, noise and pollution. This is unacceptable for both existing and new residents alike.
- To the East of Tring the valuable buffer area between the A41 and urban housing would be lost.
- The narrow High Street is already congested with cars and people. It would be unable to cope with significantly increased activity. Suitable alternative options are not available.
- The Schools in Tring are already full with no meaningful spare capacity. They also have a shortage of sports/playing fields.
- The car parks in the Town are, at peak times, full to There is no space for conveniently situated extra spaces to be provided.
- How is it proposed to upgrade the health services in the Town? For example the Rothschild Doctors' practice is already one of the biggest {if not the biggest} in the County – which is somewhat surprising given the relative size of Tring.
- Unless one arrives very early, it is impossible to park in the car park at Tring station. This has been the case for a very long time. Existing commuters cannot be accommodated let alone extra ones. Tr-h5 is not within easy walking distance of the Station.

There are no explanations provided as to how these fundamental issues will be resolved and funded. It is irresponsible for developments to be proposed that do not also fully and properly take account of their consequential effects. A Local Plan should plan for the future reflecting all relevant factors – not just identifying every large piece of Green Belt imaginable on which to build innumerable houses, industrial units, warehouses and petrol filling stations.

Planners have a responsibility to ensure that the lives of a wide range of town residents and visitors are not seriously impaired by their plans. By proposing to develop large-scale sites near small market town centres that have not had a full and proper assessment of the consequences planners are putting the quality of life of that community in serious jeopardy.

**In Section 10.2 Issue 26 - "what principles should be used when choosing growth locations" - the following " Locational Principles" appear:**

- Respect the character of the existing settlement pattern and restrict urban sprawl
- Protect the character and value of important landscapes, heritage and biodiversity
- Ensure that new development can be served by necessary infrastructure

Option Tr-h5 fails all of these principles in an irresponsible and shocking manner.

	<b>Sustainable Development (as stated in the National Planning Policy Framework)</b> means ensuring that better lives for some people today do not mean worse lives for future generations. How building on these ninety-two acres of delightful meadows and pastures surrounded by beautiful countryside does not make the quality of life worse for the residents of Tring and district both now and into the future is confounding.
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo doc 4</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15210
<b>Full Name</b>	Valerie Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p><b>Answer – YES</b></p> <p>I am strongly opposed to the site reference Tr-h5 – Land at Dunsley Farm, London Road, Tring.</p> <ul style="list-style-type: none"> <li>• This Green Belt land is bordered by the Chilterns Area of Outstanding Natural Beauty [AONB] that lies to the south of London Road and east of Cow Lane and Dunsley Farms provide an invaluable green gateway to/from the market town of Tring. This is an extremely valuable and unique feature of the Town and to destroy it would be an act of vandalism. A very large number of local residents have the enjoyment of this rural aspect regularly and visitors often remark on the outstanding beauty of the scenery as they enter Tring from the east. There are very few towns in the northern Home Counties (if any) that can boast a landscape as attractive. The “Vision” section of the Local Plan states <i>“the natural beauty of the Chiltern Hills and varied character of the countryside is admired and cherished”</i> The objectives of the Plan include statements such as <i>“to protect and enhance Dacorum’s distinctive landscape character”</i> and <i>“safeguard the countryside and attractive landscape from development”</i> It is undisputed that the eastern entrance of Tring would be identified as one of the most attractive landscapes within Dacorum and, as such, must be preserved at all costs. Not to do so makes nonsense of the much-stated objectives of this and previous planning documents about the</li> </ul>



preservation of the Borough's outstanding scenery locations.

- Spreading the development of Tring eastwards along the line of London Road/A4251 towards Cow Roast/Dudswell/Northchurch/Berkhamsted is akin to a form of Ribbon Development and amounts to urban sprawl. The suggestion that travel communication would be improved and journey times reduced by building adjacent to an arterial road is long dis-credited. Development of this type is undesirable for many widely known reasons – not least because it produces congestion, unsafe traffic conditions and ugly countryside. Green Belt policies were developed more than 60 years' ago to specifically to stop this type of urban sprawl.
- 'Exceptional circumstances' have to be proven to change Green Belt boundaries – and there is no evidence that such circumstances exist to justify re-designating the Dunsley Farm site.
- Very substantial housing development has taken place recently around Aylesbury and much more is planned. Huge housing and infrastructure developments are taking place to the east of the town {i.e. towards Tring} with 2450 new homes in Broughton and 3000 in Weston Turville. A substantial proportion of this housing is designated affordable. Both of these plus other smaller projects are adjacent or very near to the A41. Given, therefore, that into the future there will be much less open countryside between Tring and Aylesbury it is imperative that the current open spaces to the east of Tring are not encroached upon. There is a great danger of having an A41 corridor that is a continuous network of urban communities. This would be disastrous for Tring and its neighbouring communities.
- Dunsley Farm is a totally unsuitable site for additional small and medium sized industrial and warehouse units. The location is in close proximity to the market town of Tring and more than 12 acres of industry would have a disastrous effect on the rural green eastern entrance to the Town. The extra traffic generated would cause unacceptably high commercial vehicle and heavy lorry movements causing congestion, unsafe road conditions and pollution. Green Belt land can only be re- designated if exceptional conditions apply. It is inconceivable that such conditions apply in this case.
- The proposed development is highly visible. It would, if developed, represent a vast sprawling eyesore to many residents and visitors alike.
- The proposed site is very close to the A41 – and would eliminate the important buffer between the busy main roads and existing built up areas of the Town.
- There is no requirement for an additional petrol filling station and supermarket in Tring. Again it is impossible to imagine the justification for the 'exceptional circumstances' required to use Green Belt land for these purposes.

- Valuable farmland would be lost [Two active livestock farms occupy the site – the land has been misleadingly described as “Open Fields” in the document]. There are hardly any livestock farms close to Tring town whereas there are many less productive open fields much less economically utilised and with far less landscape issues. The farming sector will undergo great change when Britain leaves the European Union and productive fertile farmland will be required to be an even greater national asset.
- The area includes a valuable grassland Local Wildlife Site that must be preserved. As testament to the success of this site in supporting local wildlife - to my knowledge over fifty species of wild birds have visited the household gardens adjacent to this site. The National Planning Policy Framework states that the conservation of wildlife heritage is an important consideration and should be given great weight in Areas of Outstanding Natural Beauty. Building on these farm meadows and pastures would result in the loss of irreplaceable natural asset.
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- The Wildlife Site exhibits the Ridge and Furrow archaeological pattern of ploughing created by the ridges and troughs used by farmers in the Middle Ages. This method was used up to the 17th Century and meadows that still possess this feature have not been ploughed since then. This ripple effect is particularly noticeable following snowfalls – see photo attached.
- Walkers, many with dogs, use the Tring Town footpath crossing Cow Lane Farm extensively for countryside exercise.
- The site is sandwiched between, and would impact upon, Tring Park and Pendley Manor – both highly important open space locations.
- Use of this site for housing, industrial units, warehouses etc. would negate its potential future use for a new (secondary) School with adjacent playing fields and/or additional Sports facilities for the Town.
- A site should not be chosen primarily on the grounds of ease of development or influenced by who owns the land. First and foremost a site should be chosen for its suitability.
- In the consultation process for the Emerging Core Strategy in 2009 there was overwhelming opposition to the development of the Cow Lane Farm/Dunsley Farm site. There were more Core

	<p>Strategy responses from the small town of Tring than for Hemel Hempstead, Bovingdon, Kings Langley, Markyate and Countryside combined.</p> <ul style="list-style-type: none"> <li>Over 95% of respondents to the question “Do you prefer the Dunsley Farm option for development” answered No – only 17 in favour but 337 against. For this site to be included in the latest options when so many residents and visitors considered its development would be severely damaging to the character of Tring town makes one conclude that the strongly held views expressed by so many are over time simply dismissed as unimportant or irrelevant. It is unsurprising that ordinary people are disillusioned with the consultation process conducted by Local Government when their voices are blatantly ignored.</li> </ul>
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo 1</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15211
<b>Full Name</b>	Valerie Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>Shown (attached) below are views of the Dunsley Farm site looking southwards toward Wigginton and The Ridgeway National Trail on the escarpment i.e. viewed towards part of the Chilterns Area Of Outstanding Natural Beauty.</p> <p>This total potential development site comprises some ninety-two acres incorporating a large supermarket, a petrol filling station, twelve acres of industry/warehouses and a very substantial housing development. For the development of this area to have an assessment of only MEDIUM impact on the landscape is incomprehensible – and totally bewildering. There needs to be a full independent review of this conclusion.</p> <p>The two Cow Lane Farm meadows and pastures in the foreground are part of the potential development site. They are used for grazing cattle. They form part of an important grasslands Local Wildlife Site.</p> <p>This irreplaceable landscape is extremely precious and we have a responsibility to preserve it intact for current and future generations.</p>
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo 2</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15212
<b>Full Name</b>	Valerie Smith

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>Shown (Attached) is a view across Dunsley Farm looking North East towards Ashridge and Ivingoe Beacon. For development on this ninety-two acre site to be labelled a "Medium" impact on the local landscape beggars belief.</p>
<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo 3</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15213
<b>Full Name</b>	Valerie Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>This is to be treated as two identical responses from 1) Bert Smith - 2) Valerie Smith.</p> <p>The Attached document shows part of Dunsley Farm viewed from the South and also aerial image of Tring identifying the area Dunsley Farm.</p> <p>The Dunsley Farm site remains the only significant tract of green countryside close to the Town Centre and is adjacent to Tring Park {one of the County's most important ecological sites} on one side and Pendley Manor on the other. To extend the town's development into this scenic green wedge of farmland, woodland and grassland would be catastrophic for the Town and its unique character. It is a vast area relative to the size of the Town.</p> <p>It is nonsense to suggest that the infrastructure implications of a site cannot be properly assessed until that site has been chosen. Its effect on the community is a fundamental component in the choice of a potential site.</p> <p>In the case of Tr-h5 there are the following to be considered:</p> <ul style="list-style-type: none"> <li>• Cow Lane is currently wholly inadequate and unsafe. The prospect of a huge increase in traffic movement is unimaginable.</li> <li>• A high increase in cars and commercial traffic {including lorries} in London Road will cause much higher congestion, noise and pollution. This is</li> </ul>

unacceptable for both existing and new residents alike.

- To the East of Tring the valuable buffer area between the A41 and urban housing would be lost.
- The narrow High Street is already congested with cars and people. It would be unable to cope with significantly increased activity. Suitable alternative options are not available.
- The Schools in Tring are already full with no meaningful spare capacity. They also have a shortage of sports/playing fields.
- The car parks in the Town are, at peak times, full to There is no space for conveniently situated extra spaces to be provided.
- How is it proposed to upgrade the health services in the Town? For example the Rothschild Doctors' practice is already one of the biggest {if not the biggest} in the County – which is somewhat surprising given the relative size of Tring.
- Unless one arrives very early, it is impossible to park in the car park at Tring station. This has been the case for a very long time. Existing commuters cannot be accommodated let alone extra ones. Tr-h5 is not within easy walking distance of the Station.

There are no explanations provided as to how these fundamental issues will be resolved and funded. It is irresponsible for developments to be proposed that do not also fully and properly take account of their consequential effects. A Local Plan should plan for the future reflecting all relevant factors – not just identifying every large piece of Green Belt imaginable on which to build innumerable houses, industrial units, warehouses and petrol filling stations.

Planners have a responsibility to ensure that the lives of a wide range of town residents and visitors are not seriously impaired by their plans. By proposing to develop large-scale sites near small market town centres that have not had a full and proper assessment of the consequences planners are putting the quality of life of that community in serious jeopardy.

**In Section 10.2 Issue 26 - "what principles should be used when choosing growth locations" - the following " Locational Principles" appear:**

- Respect the character of the existing settlement pattern and restrict urban sprawl
- Protect the character and value of important landscapes, heritage and biodiversity
- Ensure that new development can be served by necessary infrastructure

Option Tr-h5 fails all of these principles in an irresponsible and shocking manner.

***Sustainable Development*** (as stated in the **National Planning Policy Framework**) means ensuring that better lives for some people today do not mean worse lives for future generations. How building on these ninety-two acres of delightful meadows and pastures surrounded by beautiful countryside does not make the quality of life worse for the residents of Tring and district both now and into the future is confounding.

<b>Include files</b>	<a href="#">Bert &amp; Valerie Smith photo doc 4</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15214
<b>Full Name</b>	Mr Mike Kember
<b>Company / Organisation</b>	Bovingdon Parish Council
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Parish Council held a Public Meeting on 5th December to which in excess of 200 residents attended to express their views. The overwhelming concern at the meeting was the lack of any additional infrastructure proposals to enable the village to cope with an estimated increase in excess of 20% in the number of homes, and the resulting increase in population. The current infrastructure of the village is unable to cope with the existing population, in addition to which, the village is already committed to providing an additional 90 new homes by 2031 i.e. 60 on Site Allocation LA6 – Molyneaux Avenue and 30 through windfall, over half of which have already been provided.</p> <p>The current infrastructure issues can be categorised as follows:</p> <p><b><u>Parking / Traffic</u></b></p> <p>Serious issues in the High Street caused by:</p> <ul style="list-style-type: none"> <li>• Commercial deliveries blocking access to the main shops, hindering the flow of traffic, preventing access to parking spaces and generally causing congestion in the High Street.</li> <li>• The dropping off and collection of children from the Primary School, at these times the High Street becomes impassable on a regular basis, this results in serious congestion and restricted traffic flow and is clearly a danger to the safety of children and adults.</li> <li>• The road width at the top of the High Street leading from the Hempstead Road junction is severely reduced by parked cars, the potential for a serious accident at this junction is very high with vehicles entering the High Street from the Chesham or Hempstead roads having a restricted view of the traffic travelling north on the High Street.</li> <li>• Due to restricted road width, vehicles including HGV's and public service vehicles are mounting the pavement in order to pass vehicles travelling in the opposite direction. This clearly compromises pedestrian safety; there have been a number of reported near misses in the recent past.</li> </ul>

- There is no designated car park for the village, which leads to haphazard and, frequently, dangerous parking. It severely hampers the commercial viability of the various shops and businesses that are located in the High Street.

A significant number of vehicles are using Bovingdon High Street as a through route to Watford, Chesham and Hemel Hempstead. This is adding to the issues raised above and results in very high traffic volumes within the High Street on a daily basis. This is also having an adverse impact on the country lanes that surround Bovingdon, as vehicles endeavour to find alternative, less congested routes to their chosen destination.

### **Road network**

Building on the issues highlighted above it should be noted that the Hempstead Road / Chesham Road B4505 is recognised as the busiest B road in the County – 77,000 movements a week in 2015 of which 2,000 were heavy goods vehicles.

A significant amount of additional traffic is generated by activities at Bovingdon airfield; it has become an increasingly popular location for film companies and is in almost continuous use as a location for film and television. Currently it is hosting Dancing on Ice and a number of new planning applications have recently been made to develop this type of use for extended periods. The airfield is also in regular use on Saturdays as the location for the Bovingdon Market, further adding to the volumes of traffic.

This will be exacerbated by the Chiltern District Council proposal to build 900 new homes at Lye Green, Chesham, from where the most direct route of access to the A41, A405, M1 and M25 motorways will be along the B4505 through Bovingdon.

### **Bovingdon Primary Academy**

Bovingdon Primary Academy School is in the 'Outstanding' category, resulting in it being in high demand. The school is currently a two-form entry school and it is at capacity. Any expansion in the local population will increase the number of primary school aged children needing to attend the school.

The current site and buildings are old in structure, design and situated in inadequate grounds with no room for expansion. We understand that the school currently fails to meet minimum open space requirements. Therefore, it would appear that there will be a requirement for a replacement Primary School, with an additional form entry.

### **Medical facilities**

We understand that the GP surgeries are near to capacity, as are the Dental surgeries. There are two GP surgeries in Bovingdon,

- Longmeadow Surgery, the GP team is primarily based in Kings Langley. With the possibility of a significant increase in housing at Kings Langley, this could well have an adverse affect on the operation of the Bovingdon surgery.

- Archway Surgery is a limited one-doctor facility with a small team of locums supporting the surgery. It will struggle to support any increase in number of patients.

These surgeries both operate out of adapted premises with limited facilities. Neither has any patient parking and both are situated in the High Street. This results in patients having to park in the High Street, adding to the parking and pedestrian safety issues.

#### **Drainage and flooding**

There are long standing and well-documented problems with drainage and flooding in various locations within the parish and any new development will intensify these problems.

A strong example of the issues the village suffers from in this regard is the Green Lane and High Street junction. There is currently a “run off” that comes from Green Lane, Chipperfield Road and High Street and the excess water collects into the ‘docks’ at this junction. In September 2016 there was significant flooding at this junction resulting in damage to several of the houses in the area. Any future developments, particularly the two sites identified in this vicinity, will add greatly to the water run off and flooding will become more regular and affect more properties.

#### **Community facilities**

Bovingdon already has a deficit in leisure facilities, both indoor and outdoor and it has a significant under provision of open spaces, which has been highlighted in a number of recent village design statements. The Memorial Hall was built in 1921 and is not able to meet the demands of the current population. In addition, the Scout hut has been condemned with no suitable alternative facilities currently being available.

#### **Summary**

We would highlight that the core strategy itself is in line with the issues referred to above, it highlights the local needs of keeping the village compact, retaining the historic nature and enhancing the village centre by tackling the traffic problems and lack of parking in the High Street.

There is a general concern that proposals are being driven by land owners indiscriminately promoting their sites, without a considered development strategy. The Local Plan, in respect of any of the sites in Bovingdon, does not demonstrate any exceptional circumstances requiring the release of Green Belt land. Therefore, the principle should remain of no development in the Green Belt.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15217
<b>Full Name</b>	Mr Mike Kember
<b>Company / Organisation</b>	Bovingdon Parish Council
<b>Position</b>	



<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The Parish Council, after listening to our resident's views, consider that none of the Local Plan options address the infrastructure problems outlined in the core strategy, they will only add to them. Therefore we conclude that the only viable option for the village of Bovingdon is for the Borough to adopt Option 2B, as no additional housing can currently be supported in Bovingdon for the reasons that we have highlighted above.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15228
<b>Full Name</b>	Lynn and David Lovell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Building 450 new homes in and around Bovingdon, which already has 1,750 homes, would represent an increase of 25% in terms of homes, population and cars.</p> <p>Bovingdon's infrastructure is already at breaking point and increasing the total number of homes to this extent without addressing the village's major existing traffic congestion and parking problems will make both far worse and the knock on adverse impact on local business, air quality, road safety and quality of life would be hugely detrimental.</p> <p>In addition, community services such as Bovingdon Academy, doctors and dentists are already near or at capacity and it is difficult to see how these could be extended to cope with such a dramatic increase.</p> <p>Also the loss of Green Belt land conflicts with Dacorum's Core Strategy to "minimise impact on Green Belt" and "safeguard the countryside" and once built on it is gone forever. The adverse environmental impact of the proposed housing development and associated increase in population and cars including cannot be underestimated. There would be a significantly increased flood risk particularly at the Ryder memorial which is already at risk having suffered a major flood a year ago reported on national news. Water abstraction would increase, in turn impacting negatively on soil quality and overloading of drainage/sewer systems.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15236
<b>Full Name</b>	Lynn and David Lovell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The chronic traffic problem in and around the High Street will get worse. Parking spaces at the top of the High Street will be lost when Tesco arrives as there will be double yellow lines around the cross roads and down the High Street. The recent addition of double yellow lines at the bottom of the High Street together with several dropped kerbs already deprive short term shoppers of stopping places and adversely impact local retail businesses. So the following solutions should be investigated urgently:</p> <ol style="list-style-type: none"> <li>1 Parking in the High Street restricted to 2 hours between 0800 and 2200 Monday to Saturday</li> <li>2 No HGV deliveries between 0800 and 2200</li> </ol> <p>Convert the school car park into a public car park and relocate the school car park to land at the back of the school with access off Vicarage Lane. This will release 30 parking spaces. The additional traffic movement along Vicarage Lane (30 cars arriving in the morning and leaving in the afternoon) during the school term only) is a small price to pay if it eases the problem. The school car park is already made available to the public on Saturdays and it provides welcome relief</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15237
<b>Full Name</b>	Lynn and David Lovell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In the unfortunate and, we hope, unlikely event that Bovingdon is required to absorb significant new housing development, our strong preference is for this to be limited to one site: the site bounded by the Chesham Road and Green Lane (Bov-h1 Grange Farm). We believe that this is by far the most suitable of the 4 proposed sites because it is surrounded by natural, mainly road, boundaries (Green Lane and Chesham</p>

	Road) and would effectively be an extension to the Moody estate, the last major housing development in Bovingdon.  <b>Objection</b> <i>We strongly object to Bov-h2 and h3 as access would be restricted – effectively opening 3 existing narrow culs-de-sac which are themselves congested. Our road, Yew Tree Drive, already provides overspill car parking for houses in Chipperfield Road.</i>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15239
<b>Full Name</b>	Lynn and David Lovell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<i>Without infrastructure improvements, any level of significant development in Bovingdon is not sustainable and will negatively impact the quality of life in our village.</i>  <i>If development is not restricted to the existing Dacorum towns then the requirement should be shared more equitably with Chipperfield and restricted to one Bovingdon site: Grange Farm - Bov-h1.</i>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15240
<b>Full Name</b>	Garry Pearson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am writing to express my views on the proposed new local plan to 2036 in the consultation paper covering the four potential development sites around Kings Langley.  Kings Langley is a beautiful village with great proportions in line with its charming character and has lovely rural surroundings. The High Street gives the village an individual character and is supported well by the current residence.  It would be devastating to lose the green belt area and risk overcrowding the village, if indeed Kings Langley

	<p>would remain as a village rather than becoming a town. I feel this large-scale expansion would be unsustainable for the village and current services such as medical, schooling, roads and parking would be overwhelmed and would destroy the community spirit.</p> <p>The thought of the village spreading to coalesce with other settlements like Apsley (Hemet Hempstead) would also be disastrous for the locals who love their village identity.</p> <p>I will not discuss all the issues with the local infrastructure in detail as these will be obvious to all within the planning department. Increasing the population by many hundreds would only add to the major congestion issues through the village centre. Suffice to say that the fact that the main route through the village is often at standstill during morning and afternoon/evening peak periods is a hazard with regards to restricting the movement of emergency services.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15241
<b>Full Name</b>	Garry Pearson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	One of the proposed development sites would also mean the destruction of one of the two dairy farms in the parish. I find this an unacceptable prospect and know many villagers feel the same about this farm which sets the scene for the village as you enter from the South
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15244
<b>Full Name</b>	Mr & Mrs Alan & Anne Sewell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We are writing to express our objection to the proposal in the draft Dacorum Local Plan to develop a small agricultural field on the Green Belt adjacent to Ivy House Lane, site reference Be-h-3 and to the Dacorum new Local Plan in general.

The main reason for our objection is that we do not believe that the infrastructure requirements linked to the addition of 150 houses to a quiet rural road have been adequately thought through. The site appraisal suggests that the only additional infrastructure proposed by the promoter is 'cycle/footpath links.' However, Ivy House Lane is currently a rural lane with no footpath and mostly only single-track, and would require significant investment in order to allow appropriate access to either or both ends of the proposed development. The Council's own notes on this topic argue that "this is a rural lane that would require considerable upgrading to accommodate any new development."

The promoter has apparently suggested that an alternative access may be feasible – but this has not been specified in the public documents;

- We believe that access through Meadway is unlikely to be possible, as it is a private road.
- Increasing access from the south (Bank Mill) would be prohibitively expensive given the need to widen not one but two single-track bridges, one over the canal and one over the railway. Increased traffic along Bank Mill is problematical.
- Increasing access from the north, i.e. from the Potten End Road, would have severe knock-on effects to traffic on Gravel Path and the surrounding roads, as well as a detrimental effect on the rural environment next to and including the Common. Indeed the Top of Gravel Path and Gravel Path itself are already areas with a high incidence of accidents.

Additionally none of these roads is near a bus stop, which provides further evidence that the site is ill-suited for development. The hill between the site and town is so steep that it stops all but the most energetic cyclists from being able to cycle up it.

We do not accept the arguments that the field in question should be removed from Green Belt and ask that this be considered in detail by the Council.

The area is currently low-density in terms of housing, and is not an appropriate place to introduce such dramatically increased density of housing.

More broadly, looking at the location of other proposed development sites, in both Berkhamsted & Dacorum, it is clear that the Ivy House Lane site will offer a much poorer return on infrastructure development than other proposed sites. For the addition of up to 150 houses, and probably fewer in such a constrained valley site very significant infrastructure expenditure would be required. By contrast, developing larger sites elsewhere would result in much lower infrastructure spending per housing unit. It would not be good value for money to develop this site.

Accessing a steep site with restricted access and possibly a cul de sac development would be problematic for refuse vehicles.

<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO15245
<b>Full Name</b>	Mr & Mrs Alan & Anne Sewell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Dacorum should focus housing development in Hemel Hempstead creating a vibrant mixed housing community with investments in infrastructure like other more successful New Towns have done. New Town development should be the primary focus for the housing targets in Dacorum, the small market towns and villages should be encouraged to retain their character which is part of the asset of this part of Hertfordshire. Indeed Dacorum should be ensuring that previous housing targets in Hemel Hempstead are met and reflected in the re balancing of the targets for the District.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15295
<b>Full Name</b>	Caroline Manson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p>

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

Yes

**General Comment:**

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments. BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals. In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum." In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

(the whole has been written by DBC and the review of DBC is a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

I believe that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where

they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand. A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**At the consultation stage of the Core Strategy, Dacorum Planning Department make a number of strong statements of principle relating to the Berkhamsted Spatial Strategy which are being overturned in the current proposals without reason or explanation. Many of the sites now proposed are specifically identified in the Berkhamsted Vision Diagram as being “Sensitive Valley Sides”.**

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development.
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites –



detached housing on large plots at very low densities. New development should be low density.

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation area. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is delivered. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of

high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

**Importantly the Core Strategy (endorsed by Councillors) rejected a number of sites in Berkhamsted giving detailed reasons for rejection – yet just a few years later Dacorum planning are ignoring these reasons without explanation and putting these very sites forward for development. The reasons previously given for rejection still hold good and itemised under each of the sites below.**

**Specific Comments on individual sites:**

**Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary.
- Development would be highly visible from this prominent ridge top location.
- Erosion of buffer between bypass and existing built up area.
- Poor relationship to town centre services and facilities, employment land and station.
- Important transition area between the town and open countryside would be damaged.
- This could also set a precedent for further development of land southwards to the A41.
- Not well related to existing housing.
- Visual impact on important gateway to town from A416 and A41.
- Proximity of A41 bypass.
- Potential impact on the setting of Ashlyn's Hall.

**In addition I make the following objections:**

- This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

- Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below
  - Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
  - The loss of productive farm land.
  - Impact on the Green Gateway into the town – impact on transition area from urban to countryside
  - The land is not well related to existing services and facilities in the town centre.
  - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it.
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability
  - Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle
- Site Appraisals all negative issues – mitigation relies on
- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.
  - BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:
  - Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as

benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Inquiry. Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway

station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue**– TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car.”
- Berkhamsted railway station and commuter line to Euston is already at full capacity.
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and

expand existing woodland rather than creating more pollution.

- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more.

### **Be-h2 Haslam Fields, Shootersway**

#### **Core Strategy identified the following reasons against development on this site**

- Site is insufficient on its own, but could be phased with other land.
- Site is part of the open transition area between the town and the wider countryside.
- New building could set a precedent for further development of land southwards to the A41.
- Site is too small to offer scope for additional town-wide leisure space.

#### **In addition I make the following objections:**

- Identified in Site Appraisal as – Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4.
- Inadequate capacity of Shootersway – the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

### **Be-h3 Land at Ivy House Lane**

#### **Core Strategy rejected this option for the following reasons:**

- Proximity to Chilterns AONB.
- Strong countryside/Green Belt boundary would be breached.
- Impact on valley sides and important dry valley location.

#### **In addition I makes the following objections:**

- Fails to meet Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges.
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

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

**Core Strategy rejected this option for the following reasons:**

- Strong countryside boundary.
- Impact on landscape/Chilterns AONB.
- Impact and visibility of development on valley sides.



- Poor relationship to town centre services and facilities, employment land and station.

**In addition I make the following objections:**

- Fails to meet Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestion that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the

Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

#### **Be-h5 Land at Lockfield, New Road, Northchurch**

##### **Core Strategy identified the following reasons against development on this site:**

- Site is insufficient on its own, but could be phased with other land.
- Some distance from the town centre.
- Next to the Chilterns AONB.
- Site is too small to offer scope for additional town-wide leisure space.
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
- Visually prominent site.
- Proximity to railway line.
- Impact on setting of the canal.

##### **In addition I make the following objections:**

- Close to canal – undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
- Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

#### **Be-h6 Land adj. to Blegberry Gardens, Shootersway**

##### **Core Strategy identified the following reasons against development on this site:**

- Some distance from the town centre.
- Important transition area between the town and open countryside.
- New building could set a precedent for further development of land to the A41 bypass.
- Site is too small to offer scope for additional town-wide leisure space.
- Very close to the A41.

##### **In addition I make the following objections:**

- Fails to meet Dacorum or Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community services.
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders

- Site of archaeological significance
- Not recommended for removal from Green Belt
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

#### **Be-h7 Land at Bank Mill Lane**

#### **Core Strategy rejected this option for the following reasons:**

- Encroachment of the urban area along the valley bottom and into adjoining open countryside.
- Distance from the town centre services and facilities, employment land and station.
- Impact on setting of the River Bulbourne.
- Reduction in the degree of separation between the town and Bourne End

#### **In addition I make the following objections:**

- Expansion of town to east – would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment

- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services – residents won't be walking and cycling to the town

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

- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top – Poor accessibility to employment, retail, health and community services – no public transport – increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch – Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – too far for residents to walk to and from the town
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Include files	<a href="#">BRAG response to Issues Options.pdf</a>
Number	Question 46
ID	LPIO15297
Full Name	Caroline Manson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I would like to register my views on the current consultation regarding the proposed developments in Dacorum and in particular Berkhamsted, where I have been a resident for over 20 years.</p> <p>I am attaching the more detailed comments compiled by the Berkhamsted Residents Action Group, which I fully support.</p> <p>Thank you for your consideration of my views and I hope that you will make a decision which protects the current character of our beautiful Market Town.</p> <p>I feel strongly that the town is already over-developed, with current residents struggling to get doctor's appointments, struggling to park in the town and the schools bursting at their seams. I have worked at Ashlyns School for the last 10 years, and am aware that they have already raised their PAN from 210 to 240 from September 2016 and are still over-subscribed. The town has already grown substantially over the last few years, with large developments at the top of Durrants Lane and along the High Street by the Old Mill. This has already put an extra strain on the resources of the town. We also need to be sensitive to the fact that the town sits within protected green belt and beautiful countryside, which is home to much wildlife and by adding so many new houses, our town is at risk of being ruined for the people and wildlife who currently reside here.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46: <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></b></p> <p>Yes</p>

**General Comment:**

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments. BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals. In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum." In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(a) www.ukanderson.com/2015/04/02/DBC-GA-15-16-Review-of-ES-Mirrored/~~  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

I believe that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand. A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior

to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**At the consultation stage of the Core Strategy, Dacorum Planning Department make a number of strong statements of principle relating to the Berkhamsted Spatial Strategy which are being overturned in the current proposals without reason or explanation. Many of the sites now proposed are specifically identified in the Berkhamsted Vision Diagram as being "Sensitive Valley Sides".**

**The Emerging Core Strategy states:**

#### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development.
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density.

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street.

Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation area. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is delivered. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate



nature of the settlement. This will help protect the key district shopping and service role of the centre.

**Importantly the Core Strategy (endorsed by Councillors) rejected a number of sites in Berkhamsted giving detailed reasons for rejection – yet just a few years later Dacorum planning are ignoring these reasons without explanation and putting these very sites forward for development. The reasons previously given for rejection still hold good and itemised under each of the sites below.**

**Specific Comments on individual sites:**

**Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary.
- Development would be highly visible from this prominent ridge top location.
- Erosion of buffer between bypass and existing built up area.
- Poor relationship to town centre services and facilities, employment land and station.
- Important transition area between the town and open countryside would be damaged.
- This could also set a precedent for further development of land southwards to the A41.
- Not well related to existing housing.
- Visual impact on important gateway to town from A416 and A41.
- Proximity of A41 bypass.
- Potential impact on the setting of Ashlyn's Hall.

**In addition I make the following objections:**

- This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed
- Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below
- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land.
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside

- The land is not well related to existing services and facilities in the town centre.
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it.
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability
- Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle  
Site Appraisals all negative issues – mitigation relies on
- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.
- BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:
- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and

then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Inquiry. Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the

Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue**– TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car.”
- Berkhamsted railway station and commuter line to Euston is already at full capacity.
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution.
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more.

## Be-h2 Haslam Fields, Shootersway

### Core Strategy identified the following reasons against development on this site

- Site is insufficient on its own, but could be phased with other land.
- Site is part of the open transition area between the town and the wider countryside.
- New building could set a precedent for further development of land southwards to the A41.
- Site is too small to offer scope for additional town-wide leisure space.

### In addition I make the following objections:

- Identified in Site Appraisal as – Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4.
- Inadequate capacity of Shootersway – the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the

DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

### **Be-h3 Land at Ivy House Lane**

#### **Core Strategy rejected this option for the following reasons:**

- Proximity to Chilterns AONB.
- Strong countryside/Green Belt boundary would be breached.
- Impact on valley sides and important dry valley location.

#### **In addition I makes the following objections:**

- Fails to meet Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges.
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away

stated) and certainly no safe access for schools and children

- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

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

**Core Strategy rejected this option for the following reasons:**

- Strong countryside boundary.
- Impact on landscape/Chilterns AONB.
- Impact and visibility of development on valley sides.
- Poor relationship to town centre services and facilities, employment land and station.

**In addition I make the following objections:**

- Fails to meet Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestion that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

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



**Core Strategy identified the following reasons against development on this site:**

- Site is insufficient on its own, but could be phased with other land.
- Some distance from the town centre.
- Next to the Chilterns AONB.
- Site is too small to offer scope for additional town-wide leisure space.
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
- Visually prominent site.
- Proximity to railway line.
- Impact on setting of the canal.

**In addition I make the following objections:**

- Close to canal – undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
- Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

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

**Core Strategy identified the following reasons against development on this site:**

- Some distance from the town centre.
- Important transition area between the town and open countryside.
- New building could set a precedent for further development of land to the A41 bypass.
- Site is too small to offer scope for additional town-wide leisure space.
- Very close to the A41.

**In addition I make the following objections:**

- Fails to meet Dacorum or Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community services.
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the

problems of traffic congestion and air pollution.

Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

#### **Be-h7 Land at Bank Mill Lane**

#### **Core Strategy rejected this option for the following reasons:**

- Encroachment of the urban area along the valley bottom and into adjoining open countryside.
- Distance from the town centre services and facilities, employment land and station.
- Impact on setting of the River Bulbourne.
- Reduction in the degree of separation between the town and Bourne End

#### **In addition I make the following objections:**

- Expansion of town to east – would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the

town centre facilities and services – residents won't be walking and cycling to the town

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

- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top – Poor accessibility to employment, retail, health and community services – no public transport – increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch – Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable – too far for residents to walk to and from the town
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15298
<b>Full Name</b>	James and Rosemary Good
<b>Company / Organisation</b>	
<b>Position</b>	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Before any consent (including outline permission) on any of these proposed sites is contemplated, urgent consideration should be given to the following.</p> <p><b>ONE:</b> Local roads are already 'log jammed' at peak commuting periods. The old A41 (now A4251) between Hemel and Kings Langley is of insufficient capacity for present needs, compounded by 'office on street parking' at Apsley and Kings Langley. Local lanes linking Abbots Langley, Aspley, Berkhamsted, Bovingdon, Chandlers Cross, Chipperfield, Kings Langley and Tring are often very narrow and come under the same criteria. A further 10,940 (minimum) cars/vans is hardly an answer! Current public transport is patchy, with few or no bus services between the smaller villages. Rail services between Hemel Hempstead and London/The North are also at capacity, in terms of space and frequency, during the commute period. Where are all the proposed extra passengers to be accommodated?</p> <p><b>TWO:</b> Doctors in this area will face massive over-working and over-crowding in their surgeries. Local schools are already filled to their limit. Have infrastructure issues such as power availability and sewerage disposal capacity been given sufficient attention?</p> <p><b>THREE:</b> Surrounding villages have a long and proud individual history and character which will be diluted and lost as they become morphed together, should these proposals be allowed to proceed.</p> <p><b>FOUR:</b> The current Green Belt which has always protected and safe-guarded our rural heritage, will be severely impinged upon. This will have an extreme and adverse effect on rural amenities and public access to the rural country-side. All local village presently enjoy an abundance of wildlife and wide open spaces. Rectory Farm (Kings Langley) is designated as being an area of outstanding natural beauty. Wayside Farm (also Kings Langley) has one of only two Jersey (cattle) herds remaining in the county. Very successfully managed and run by the present tenant farm, who, in his words, is too young to retire but too old to start all over again in a different location.</p> <p>The DBC is urged to seriously re-think this housing strategy bearing in mind the comments above (and, no doubt, many others as well?)</p>
Include files	
Number	Question 46
ID	LPIO15345
Full Name	Mr Alan Conway
Company / Organisation	
Position	
Agent Name	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has already responded to the Issues &amp; Options Consultation. I have studied their comments and confirm that I support the arguments put forward in their submission.</p> <p>Q46 As someone resident in Berkhamsted for the last 50 plus years I am aware of the deterioration in the quality of life, a process which has accelerated in recent years. If the position is not stabilised then I see myself as becoming a virtual prisoner in my home. I support the BRAG submission.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process (see <a href="http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBCSM-Facsimile.pdf">http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-for-the-DBCSM-Facsimile.pdf</a> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.</p> <p>BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet</p>

the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its

attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult



- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive

- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains
- Suggestion of ‘bus loop’ not viable solution as clearly demonstrated at Core Strategy Inspection.

Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”
- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other

- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the
- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes,

blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside
  - Impact on landscape/Chilterns
  - Impact and visibility of development on valley
  - Poor relationship to town centre services and facilities, employment land and
- 
- Fails to meet Berkhamsted Vision
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of

new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- 
- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
  - Close to Northchurch AQMA

- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Situated at ridge top location at a distance from employment, retail, health and community
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
    - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
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- Encroachment of the urban area along the valley bottom and into adjoining open
  - Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
  - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision

	<ul style="list-style-type: none"> <li>• facilities and services not accessible</li> <li>• Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town</li> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15394
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>You should also consider the plight of the shops in the High Street – the more difficult it becomes to park in Berkhamsted, the more likely it is that many shoppers will go elsewhere. (We have a problem looming when the new car park is being built in Lower Kings Road as the current building programme is too long and many shops could disappear, probably never to return).</p> <p><b>Standard BRAG response to Question 46 (please note full document is attached to Q46)</b></p>

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(allowing the expansion of the DBC Green Belt to be carried out without a full analysis of stage 1).~~  
In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical

process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the

valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and

- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
  - Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
    - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
    - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from

- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway



station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private ”

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
- Site is part of the open transition area between the town and the wider
- New building could set a precedent for further development of land southwards to the

- Site is too small to offer scope for additional town-wide leisure

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling

– in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities

- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
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- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
- Some distance from the town
- Next to the Chilterns
- Site is too small to offer scope for additional town-wide leisure
- The canal bridge on New Road is narrow and results in poor pedestrian access to local
- Visually prominent
- Proximity to railway
- Impact on setting of the
  
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities
  
- Some distance from the town
- Important transition area between the town and open
- New building could set a precedent for further development of land to the A41
- Site is too small to offer scope for additional town-wide leisure
- Very close to the
  
- Fails to meet Dacorum or Berkhamsted Vision

- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

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- Encroachment of the urban area along the valley bottom and into adjoining open

- Distance from the town centre services and facilities, employment land and
  - Impact on setting of the River
  - Reduction in the degree of separation between the town and Bourne End
- 
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
  - Located in Berkhamsted Conservation Area
  - Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15396
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>As far as sports facilities are concerned, no building should take place on current sporting facilities, whether it is owned by private or public organisations. If it is not required by the private organisation, it should be taken over by a sports club or association, still to be used for this purpose. We have less public green/leisure areas in Berkhamsted than nearly every London Borough and we should be doing everything in our power to increase our leisure spaces rather than reduce them. I, therefore, vehemently oppose any building of houses on Haslam Field, a field that was gifted to the School in the 1950s.</p> <p><b>Standard BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p>

NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(as well as a report on the DBC Green Belt Review of 2015)~~  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing

- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure

and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.

- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "

- Berkhamsted railway station and commuter line to Euston is already at full
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
- Site is insufficient on its own, but could be phased with other
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  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
    - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
    - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
      - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous
    - Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane
    - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
      - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
    - Poor accessibility to schools and all other facilities
      - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has

been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.

- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
    - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
    - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not

viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd

- Situated at ridge top location at a distance from employment, retail, health and community
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River

- Reduction in the degree of separation between the town and Bourne End
- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
  - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
    - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15397
<b>Full Name</b>	Sue Wolstenholme
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in support of the submission made by the Berkhamsted Residents Action Group who have written and represented very clearly the views of many Berkhamsted Residents.</p> <p>Berkhamsted has grown too fast and has already far exceeded the requirements of the previous plan by some 34%. We do not have the infrastructure for further excessive building as nothing has been done in this area as the town has grown. Traffic and parking in the town is at a premium and, given that most of Berkhamsted is built up a hill, walking or cycling with heavy shopping is just not an option.</p> <p><b>Standard BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p>



BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2016/06/BRAG-Argts-Green-Belt-Review-the-DBC-SM-Review.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean

quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states: Built Character**

- The open valley sides would be particularly sensitive to the effects of new
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban

#### **Berkhamsted Vision**

Ø New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types

and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt
- Development would be highly visible from this prominent ridge top
- Erosion of buffer between bypass and existing built up
- Poor relationship to town centre services and facilities, employment land and
- Important transition area between the town and open countryside would be
- This could also set a precedent for further development of land southwards to the
- Not well related to existing
- Visual impact on important gateway to town from A416 and
- Proximity of A41
- Potential impact on the setting of Ashlyn's

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

o Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
  - The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade
  - Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
  - Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
  - Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
    - Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from
  - Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection

had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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  - Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
    - **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private "
  - Berkhamsted railway station and commuter line to Euston is already at full
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
    - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
    - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
  - Site is insufficient on its own, but could be phased with other
  - Site is part of the open transition area between the town and the wider
  - New building could set a precedent for further development of land southwards to the
  - Site is too small to offer scope for additional town-wide leisure
  - Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling
- in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution

- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be
- Impact on valley sides and important dry valley
- Fails to meet Berkhamsted Vision



- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
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- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside
- Impact on landscape/Chilterns
- Impact and visibility of development on valley
- Poor relationship to town centre services and facilities, employment land and
- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains

- Site is insufficient on its own, but could be phased with other
  - Some distance from the town
  - Next to the Chilterns
  - Site is too small to offer scope for additional town-wide leisure
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local
  - Visually prominent
  - Proximity to railway
  - Impact on setting of the
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
    - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town
  - Important transition area between the town and open
  - New building could set a precedent for further development of land to the A41
  - Site is too small to offer scope for additional town-wide leisure
  - Very close to the
- 
- Fails to meet Dacorum or Berkhamsted Vision
    - facilities and services not accessible
      - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
    - Situated at ridge top location at a distance from employment, retail, health and community

- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt

o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

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- Encroachment of the urban area along the valley bottom and into adjoining open
- Distance from the town centre services and facilities, employment land and
- Impact on setting of the River
- Reduction in the degree of separation between the town and Bourne End

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area

- Impact on adjacent AONB
  - Risk of flooding identified in assessment
  - Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
  - Suggestion of provision of local play space – edge of town not a practical site
  - Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
  - Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town
- 
- Site appraisal recommends exclusion from further assessment and retain as green belt
  - Site lies within CAONB – large-scale development opportunities to be avoided
  - At a distance from immediate urban edge and would extend town further into countryside
  - Close to ancient woodland
  - Loss of leisure facility
    - Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
      - Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
    - Fails to meet Dacorum or Berkhamsted Vision
      - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
      - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of
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	over-optimistic.A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15409
<b>Full Name</b>	Paul de Hoest
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>1 In summary, I think the demand is ill thought through and the choice of location of the properties reads just like these have been shoved onto the peripheries of the existing conurbations with little forethought as the impact these would have. The idea of environmental sustainability or consistency with local needs, infrastructure or heritage seems to play little role in devising these plans.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15456
<b>Full Name</b>	Nick Hanling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or</p>

the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(http://www.stalbans.gov.uk/press/2013/04/24/DBC-Grants-Review-of-GB-Sites/)~~  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with



developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

**Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed,

especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will

have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.

- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the

likelihood that a high proportion will commute to work or make their journey to the station by private car”

- Berkhamsted railway station and commuter line to Euston is already at full capacity
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult

- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
- facilities and services not accessible

- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAC's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site



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- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station
- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB

- Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities

- Some distance from the town centre
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41 bypass
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to

	Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15505
<b>Full Name</b>	Sarah and Nigel Tester
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation and I have attached their reponse which I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name. In summary, my view is that Berkhamsted cannot support a number of houses higher than that set out in the Core Strategy and it is already struggling to cope with the developments to date from that Strategy.</p> <p>I would like to take this opportunity emphasize some of the most important points within that response.</p> <p>Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>BRAG response to Question 46 (please note full document is attached to Q46)</b></p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many</p>

of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(as well as a deeply flawed DBC Green Belt Review of Dacorum)~~  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states:**

##### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

##### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

##### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

##### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41



- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems.

The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car"
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing

- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
  - Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- 
- Proximity to Chilterns
  - Strong countryside/Green Belt boundary would be breached
  - Impact on valley sides and important dry valley location
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where

over at least the past 40 years cereal/rapeseed crops have been harvested annually

- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station
- 
- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- 
- Fails to meet Berkhamsted Vision
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
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  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
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  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase

to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting



permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site

- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15507
<b>Full Name</b>	Mrs Lorene Preston
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It is far too big and could make our village a town, making coalescence with Apsley to the north and Hunton Bridge to the south.</p> <p>There is insufficient infrastructure to support so many more people - the schools are already oversubscribed, the surgeries and hospitals cannot cope with the present population, the roads are clogged with traffic and parking in and around the village gets ever more difficult.</p> <p>We have already had a large increase in population with the Ovaltine, Apsley lock + proposed 40 room McCarthy and Stone development. Our village would be irreparably damaged by so much over development</p> <p>The Green Belt is there for a reason!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15508
<b>Full Name</b>	Fatima Rauf
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Wayside Farm is a place that is regularly visited by myself, my family and many of my friends. Raw milk is becoming more popular in the market and luckily for many of the locals all over Hertfordshire - Wayside Farm is the best place to go to buy raw milk.</p> <p>I strongly urge you to take note of the issues raised above and reject the proposed development on the Green Belt in around Kings Langley</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15513
<b>Full Name</b>	Mr Mark Rogers
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Transport links are critical to the success of this project and the population growth far exceeds any mention of increased transportation methods. Increasing the number of residents and usage of the principle transport methods will impose unsustainable levels of commuting.</p> <p>The transport infrastructure at peak times cannot support demand levels in 2017. Current residents will suffer a reduction in their own free/family time due to increased commuting demands.</p> <p>Train capacity at peak hours necessitates many passengers standing shoulder to shoulder for the whole journey into Euston in 2017. Any variation due adverse weather conditions or other Network Rail issues (e.g. landslip near Watford <a href="https://www.gov.uk/government/news/2017-04-14-landslip-near-watford">https://www.gov.uk/government/news/2017-04-14-landslip-near-watford</a>) will result in increased numbers of workers unable to travel to work.</p> <p>Road capacity in 2017 around the Village are not only beyond current capacity, it is impacting on business functions. The attached images captured from Google maps demonstrates the static road conditions at different times of the day.</p> <p>The location of schools on single carriageway 'country' roads exacerbate the accessibility to many areas of the Village. Even when the weather is clement, many parents drop children off at school on their own way to work. School drop-off times are earlier and earlier than ever before due to road congestion. Proximity to the M25 (J20) and the A41 significantly contributes to the frequency of major holdups on the High St as people avoid the congestion on these routes.</p> <p>Hemel Hempstead hospital only offers only urgent care services thus necessitating travelling to Watford for emergency services. This 10miles journey suffers from acute congestion on A41 and M1 during peak hours and travelling through Kings Langley High Street is an alternative route that places more stress on the route.</p> <p>Maintaining the Village character, developed over more than a thousand years, and integrity for future generations is important, to all residents. There are brownfield sites within the Village but green belt land is one of the most vital geographic features of the Village.</p>
<b>Include files</b>	<a href="#">Mark Rogers 3 traffic maps 2017.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15561
<b>Full Name</b>	Miss Tanya Assarat
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept the attached document of this as confirmation and that I wish DBC to duplicate BRAG's responses under my name.</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process <del>(as well as being a pro-DBC and pro-Development bias)</del> a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.</p> <p>BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.</p> <p>The proposed excessive development of Berkhamsted is driven by the demand of developers to build where</p>

they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide

attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

## **Comments on individual sites**

### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

#### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.



- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate

- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of ‘bus loop’ not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with

employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”

- Berkhamsted railway station and commuter line to Euston is already at full capacity
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns

- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to

see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to

reach employment, schooling etc in rush hour or have any significant impact on car journeys

- Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway

- Distance from town centre services and vital facilities
- Some distance from the town centre
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41 bypass
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of



Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport

	<ul style="list-style-type: none"> <li>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15562
<b>Full Name</b>	Mr R. Perkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>They are totally unsustainable + any development should be on brownfield land, also approx 1,000 vacant properties in Herts to be utilised before any houses built</p> <p>Schools unable to cope</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15563
<b>Full Name</b>	Stepanie Gladstone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Since all the housing developments in Apsley and surrounding areas, Kings Langley village and access to the M25/A41 and Watford has become very strained, despite the building on the bypass</li> </ol>

	<p>20 years ago! It is very difficult to escape this new bottleneck to get to work</p> <p>2 Wayside Farm is the first farming Green Belt beyond the M25 and provides recreational access for families in Kings and Abbots Langley. Ancient footpaths should be respected and not turned into roads on estates.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15610
<b>Full Name</b>	Melanie Llewellyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.</p> <p>The town is in a valley, the infrastructure is old and already unsatisfactory and you are making proposals going against the inspector's advice.</p> <p>The publically available Open Space in Berkhamsted is already in short supply yet every inch of land which becomes available is designated for housing. It's shocking that the citizens of Berkhamsted are treated so unfairly compared to those in Hemel Hempstead where the amount of public open space is huge. Much of it is underused. In your Open Space Study now very old - 2008 - the amenities in Berkhamsted were massaged by the inclusion of land owned by schools. This land is not available for public use and completely distorts the picture.</p> <p>In Hemel Hempstead the infrastructure is new. It can withstand more development and some of the open spaces in Hemel must be used to take housing.</p> <p>I am against any further incursion into the Green Belt.</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant ongoing and planned developments.</p>

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

(~~at www.stalban.com/press/2017/04/13/DBC-Green-Belt-Review-FCS-Mind~~ a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction

in commercial viability of 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

#### **The Emerging Core Strategy states:**

##### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

##### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

##### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

##### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1).

Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

##### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not

sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the



grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either

massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not

contribute to community cohesion or sustainable prosperity

- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to

the north leading to a junction with The Common at a point near to a hazardous junction

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15612
<b>Full Name</b>	Melanie Llewellyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes



Your response - Please add your response here

I am writing to support the submissions by The Berkhamsted Town Council, the Berkhamsted Residents Action Group and The Berkhamsted Citizens Association opposing further development in Berkhamsted.

I am in favour of the redesignation of some areas such as the area in Northchurch Common off the B4506 which has small houses and which is currently designated as Greenbelt and ANOB. It is neither. It has had dwellings on it for many years which disqualifies it as Green Belt and it is not of any particular interest. This area could be developed properly with no restrictions on size and height of dwellings.

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

(~~as was demonstrated by the DBC's Green Belt Review of Dacorum~~ a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for

development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

#### **The Emerging Core Strategy states:**

##### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

##### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the

canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a

lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

#### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive

- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
  - Berkhamsted railway station and commuter line to Euston is already at full capacity
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land

- Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
  - Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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appear over-optimistic. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
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bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored

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  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of

new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
  - Close to Northchurch AQMA

- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
  - Situated at ridge top location at a distance from employment, retail, health and community services
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase

to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision

	<ul style="list-style-type: none"> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15616
<b>Full Name</b>	M B Ridley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Further more, the current traffic congestion, inaccessible hospital services (specifically those at Watford General hospital, including A&amp;E) and depletion of water supplies in the Bulbourne and Gade, indicate that even the lowest figure of 13890 extra houses is unrealistic, if the Borough is to retain the attractive image of which it is proud.</p> <p>Far from having a vision of the future, the Council seem to be proposing a nightmare.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15619
<b>Full Name</b>	Angela and Martyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We question the number of houses proposed for Berkhamsted. Apparently Berkhamsted has already delivered 10 years worth of new housing stock &amp; has already exceeded the current core strategy targets by 34%. a lot of this has been achieved by infilling, use of small brownfield sites and small developments which have to a certain extent been absorbed. The topography of Berkhamsted needs to be taken into account. Housing in the long linear market town in a narrow valley has spread from the centre and valley bottom up the steep slopes north and south. The oonly feasible areas for development are now on the ridges above th etown. For various reasons these sites are unsustainable. (see SA framework objectives)</p> <p>While laudible, the options of cycling or walking down into teh town are completely impractical. so would result in even more cars attempting to drive into the town and trying to find somewhere to park. This would exacerbate an already existing problem. Air pollution is already causing concern- more cars, delivery vans and lorries can only make it worse. Provision of a local bus service has proved unviable.</p> <p>The infratsructure in Berkhamsted has failed to keep up with current demands, and already needs major renewals. Even the modest development proposed in option 1b would require a lot of infrastructure investment. Where is the finance for this going to come from? we are firmly of the opinion that new infrastructure should be in place before further development takes place. Another local concern is the current pressure on the water supply. The River Bulbourne is already running dry in parts of the town, presumably from over abstraction. More housing can only exacerbate this.</p> <p>The effects of further development on social infrastructures such as schools, doctors surgeries, social care, parks and green space etc must be taken seriously.</p> <p>We think it is really important that the overall effects of extra housing, as instanced above, should be measured cumulatively. It is all very well to say, for example, that a small development of say 10 dwellings might only result in 10-15 extra car journeys twice a day, but it is the cumulative effect of all small developments that makes the difference.</p> <p>We also feel strongly that in considering new proposals, the well-being of current residents in general should be respected. General well-being is difficult to quantify but issues such as parking, green space (which Berkhamsted is already short of) air quality, sense of place (which is important in a market town such as Berkhamsted) access to services should be taken into account. In other words, planning for future growth should also protect teh needs of existing communities, not compromise them.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15620

<b>Full Name</b>	Angela and Martyn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	According to figures we have seen, Hemel Hempstead is 21% below the current core strategy target for new build. Higher density targets are more viable in Hemel Hempstead.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15623
<b>Full Name</b>	Mrs Annette Compton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to inform that I object to all proposals except option B.</p> <p>Reasons</p> <p>Traffic increase - On all roads but specifically in teh High Street, all parallel roads and any roads that access teh high street. In the lanes surrounding the village that are overused 'rat runs'</p> <p>School - up to capacity with no option to expand. They are already forced to use a public park for a playing field.</p> <p>Doctors and dentists are full</p> <p>Massive shortage of recreational land, park already lost during school hours.</p> <p>Village at risk of flooding due to concreting over fields</p> <p>The Parish council know and understand the village they are behind option B and I whole heartedly support their decision.</p> <p>I urge you to reject these proposals and rethink where you should put housing in this area</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15676
<b>Full Name</b>	Mr James Honour
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	



Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have attended the presentation and have read the Berkhamsted Residents Action Group response to the questions posed.</p> <p>I can agree with all their extensive points and request that you accept this as confirmation i wish to duplicate their responses under my name.</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process <del>(https://www.berkhamsted.gov.uk/2016/04/06/brag-asks-for-a-full-analysis-of-stage-1)</del> (https://www.berkhamsted.gov.uk/2016/04/06/brag-asks-for-a-full-analysis-of-stage-1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.</p> <p>BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.</p>

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of

the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of

the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

#### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

#### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place

- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'

- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of ‘bus loop’ not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home

to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
  - Berkhamsted railway station and commuter line to Euston is already at full capacity
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41

- Site is too small to offer scope for additional town-wide leisure space
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
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to the town centre and further afield are good but usage, for any purpose, remains low.

- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect

of pollution on night flying fauna should not be ignored

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station
- 
- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
  - Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few

services per day and majority of journeys would be made by car

- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision "protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne"
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated

- Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision
  - Situated at ridge top location at a distance from employment, retail, health and community services
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that

bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to

	<p>see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport</p> <ul style="list-style-type: none"> <li>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15688
<b>Full Name</b>	Mr Patrick Barr
<b>Company / Organisation</b>	Tring Hockey Club
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Context : Tring Sports Forum (TSF) response is limited only to questions and issues relating directly or indirectly to local community sport.</p> <ol style="list-style-type: none"> <li>Tring has a thriving sporting community with participation numbers way in excess of towns of a similar size. The town is home to Dacorum's leading cricket, rugby, and hockey clubs, as well as the second biggest junior football club. It is well documented that many of the local community clubs are already in desperate need of extra playing space and facilities to meet current demand*. With the resultant increase in population indicated in all the options identified for the Local Plan to 2036, the need for even more playing space and additional facilities should be an essential part of the infrastructure development for Tring to support all the options in the plan.</li> </ol> <p>* = Dacorum Playing Pitch Strategy &amp; Action Plan 2015 - 2025 - Evidence in support of plan</p> <p>Tring Sports Forum, representing the Sports Clubs listed below, strongly recommend the development of the TR-h5 site (as indicated above). This site can supply much of the infrastructure needed to support the proposed housing growth options for Tring – as well as</p>

	<p>meeting the current and urgent need for additional sporting facilities in Tring.</p> <p>Tring Sports Forum represents the following clubs with a total playing and social membership in excess of 4000 (including more than 1500 junior members):</p> <ul style="list-style-type: none"> <li>• Tring Anglers</li> <li>• Tring Athletic Football Club</li> <li>• Tring Bowls Club</li> <li>• Tring Hockey Club</li> <li>• Tring Lawn Tennis Club</li> <li>• Tring Park Cricket Club</li> <li>• Tring Rugby Union Football Club</li> <li>• Tring Running Club</li> <li>• Tring Squash Club</li> <li>• Tring Swimming Club</li> <li>• Tring Table Tennis Club</li> <li>• Tring Tornadoes Junior Football Club</li> <li>• Tring Tornadoes Netball Club</li> <li>• Tring Tornadoes Futsal Club</li> <li>• Tring Town Football Club</li> <li>• Dacorum Back to Netball (Tring Group)</li> <li>• Chiltern Canoe Club</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15735
<b>Full Name</b>	Mark Pawlett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant</p>

legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic*



levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities

should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations</i>..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p>24 See <i>House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO15783
Full Name	Maria & Colin Sturges
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town...</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East</b></p>

	<p><b>Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15784
<b>Full Name</b>	Maria & Colin Sturges
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town:-</p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has</p>

failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic*

levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- *Ibid*, 17

#### ALC Conclusions Table

#### **SSA Site Reference**



**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities

should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the *Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by *Landscape East...*" and the "...widely accepted professional and technical guidance..." namely the "*Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")*".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "*High...Medium...[or]...Low*" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "*Green Belt Parcel Numbers*", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations</i>..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p>24 See <i>House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LP1015830
<b>Full Name</b>	David Kerrigan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I fully endorse the BRAG submission on this, which is worth pointing out as I have not answered some questions, and have bundled answers to others under what seems to be the most critical one – Question 40 eliciting support or otherwise for Option 1B.</p> <p>Central to the problems for Berkhamsted sites is that it does not have the infrastructure, or the capacity to improve it, so as to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are anathema to the concept of sustainable development</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p>

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~at the same time as the DBC Green Belt Review (S11) and a full analysis of stage 1).~~  
In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**At the consultation stage of the Core Strategy, Dacorum Planning Department make a number of strong statements of principle relating to the Berkhamsted Spatial Strategy which are being overturned in the current proposals without reason or explanation. Many of the sites now proposed are specifically identified in the Berkhamsted Vision Diagram as being “Sensitive Valley Sides”.**

**The Emerging Core Strategy states:**

#### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not

represent the natural southern boundary to the town.

- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongated nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41

- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.



BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some

form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more

viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

- Site is insufficient on its own, but could be phased with other land
- Site is part of the open transition area between the town and the wider countryside
- New building could set a precedent for further development of land southwards to the A41
- Site is too small to offer scope for additional town-wide leisure space

**In addition BRAG makes the following objections**

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing

- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
  - Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Proximity to Chilterns
  - Strong countryside/Green Belt boundary would be breached
  - Impact on valley sides and important dry valley location
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where

over at least the past 40 years cereal/rapeseed crops have been harvested annually

- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would

not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

#### **Be-h5 Land at Lockfield, New Road, Northchurch**

- Site is insufficient on its own, but could be phased with other land
- Some distance from the town centre
- Next to the Chilterns AONB
- Site is too small to offer scope for additional town-wide leisure space
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
- Visually prominent site
- Proximity to railway line
- Impact on setting of the canal

#### **In addition BRAG makes the following objections**

- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
- Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

#### **Be-h6 Land adj. to Blegberry Gardens, Shootersway**

- Some distance from the town centre
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41 bypass
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the

problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....



- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15839
<b>Full Name</b>	Mark Pawlett
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO15842
Full Name	Mark Pawlett
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Please see attached a report provided by the Grove Road Residents Association. I can confirm that I am a member and as such support this document.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary</p>

	<p>to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036 " refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15845
<b>Full Name</b>	Rob McCarthy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of the hamlet of Tring Station in the Parish of Aldbury, liable to be affected by development on the proposed sites Tr-h1, Tr-h2 and Tr-h3 to the east of Tring Town, I wish to add my support to the response submitted by Aldbury Parish Council.</p> <p>Albury response :</p> <p><b><u>Proposed Change of site Tr-h1 (Land to the north of Station Road) from Green Belt to Residential</u></b></p> <p>The site comprises 52 hectares of agricultural land with the proposed use primarily for residential development but could also include recreational and community facilities. The landowner (Harrow Estates plc) and agent (Turley) propose a potential housing capacity of up to 1,000 dwellings but it should be appreciated that the site could contain up to 1,820 dwellings if the site is given over wholly to housing. The site does not lie within the Chilterns Area of Outstanding Natural Beauty (AONB) but is in the Green Belt. The principles of the Green Belt</p>

are set out in the National Planning Policy Framework (NPPF) (Section 9 – paras 79-92). Green Belt exists to provide open space and to prevent urban sprawl. NPPF para 79 states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence”. It is there neither to protect nor to enhance the landscape, although it may do that incidentally. The effect of building housing along Station road on this site will be to extend Tring Town geographically so that it absorbs the hamlet of Tring Station, the West Ward of Aldbury Parish. This will permanently remove the buffer zone between Tring Town and the Chilterns AONB. It will also impact adversely on visual aspects of the Chilterns AONB which covers part of the south side of Station Road opposite the site Tr-h1. The site will also adjoin the Chilterns AONB to the east if the site is developed as far as the Grand Union Canal.

Aldbury Parish Council is against the development of the site Tr-h1. It has insufficient knowledge of the Borough as a whole to be able to suggest alternative sites that should be developed instead of Tr-h1. It does in any case, as stated above, recommend Growth Option 2B with its greater focus on Hemel Hempstead. It does moreover believe that the site should be very low in the priority of sites to be considered for development in view of the loss of the buffer zone between Tring Town and the Parish and the permanent damage that would be inflicted on the neighbouring Chilterns AONB. The Parish Council does of course recognise that most of the site Tr-h1 is in Tring Town and that Tring Town Council will have its own views on priorities that it will wish to contribute. However the Parish Council does not believe that it is in the interests of the Borough or the local environment for this site to be developed. The site provides a green space that adds visual attraction to the journey between Tring Town and Tring Station and provides a much needed buffer between Tring Town and the Chilterns AONB. This after all was the whole point of this land being designated as Green Belt.

**Potential Infrastructural Requirements if site Tr-h1 is removed from the Green Belt**

If site Tr-h1, is to be removed from the Green Belt, Aldbury Parish Council agrees in principle with the provision of a primary school, a community hall, multiple use games area (MUGA) and health centre. Shopping facilities would also be worth considering. It would be sensible for facilities to be located in the sector closest to Tring Station as the hamlet is poorly served for facilities, apart from the obvious major facility, the railway station. The existing community hall, “the Iron Room”, has limited facilities, has no dedicated off street parking and there is very limited on street parking available. The green space to the rear of the Iron Room serves as the children’s play area but is just a green space. It has to be assumed that no further car parking spaces will

	<p>become available at the railway station due to Green Belt/AONB constraints. The emphasis will have to be on sustainable access, e.g. cycle/footpath links, commercial bus links and community bus links from surrounding areas. There may at some stage need to be consideration of a Park &amp; Ride scheme depending on the scale of development approved. There would also need to be consideration given to traffic calming in the hamlet of Tring Station to take account of increased traffic volumes. There are already particular difficulties and safety concerns with access from Northfield Road &amp; Clarkes Spring onto Station Road due to the volume of existing traffic during peak times.</p> <p>Careful and detailed consideration will need to be given to the potential infrastructure requirements if all or part of site Tr-h1 is removed from the Green Belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15846
<b>Full Name</b>	Rob McCarthy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of the hamlet of Tring Station in the Parish of Aldbury, liable to be affected by development on the proposed sites Tr-h1, Tr-h2 and Tr-h3 to the east of Tring Town, I wish to add my support to the response submitted by Aldbury Parish Council.</p> <p>Albury response :</p> <p><b><u>Proposed Change of sites Tr-h2 (Land west of Marshcroft Lane) and Tr-h3 (Land at Icknield Way/Grove Road (New Mill)) from Green Belt to Residential</u></b></p> <p>The site Tr-h2 comprises 4.68 hectares of agricultural land with the proposed use being for residential development. The landowner (Simon Westrope) and agent (Bidwells) propose a potential housing capacity of up to 77 dwellings but it should be appreciated that the site could contain up to 163 dwellings if the site is given over wholly to housing. It is of course for Tring Town Council to make detailed comments on the possible development as it sees fit.</p> <p>The site Tr-h3 comprises 14.66 hectares of agricultural land with the proposed use being for residential development. The landowner (RELX) and agents/developers (Gallagher Estates and Pegasus</p>

	Group) propose a potential housing capacity of up to 400 dwellings but it should be appreciated that the site could contain up to 513 dwellings if the site is given over wholly to housing. It is of course for Tring Town Council to make detailed comments on the possible development as it sees fit.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15847
<b>Full Name</b>	Rob McCarthy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of the hamlet of Tring Station in the Parish of Aldbury, liable to be affected by development on the proposed sites Tr-h1, Tr-h2 and Tr-h3 to the east of Tring Town, I wish to add my support to the response submitted by Aldbury Parish Council.</p> <p>Aldbury response :</p> <p>Aldbury Parish Council would be against the linking of sites Tr-h1, Tr-h2 and Tr-h3 to form a neighbourhood stretching from Station Road to Bulbourne Road B488. This would give a housing capacity of between 1,477 houses to 2,496 houses which would constitute gross over development. By itself the creation of a new Tring north east distributor road (connecting Station Road/Marshcroft Lane/Bulbourne Road) would not seem to provide any benefit as it will merely move traffic from one congested road to another congested road in both directions. No one will be getting anywhere any more quickly.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15850
<b>Full Name</b>	Judith McCarthy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here

As a resident of the hamlet of Tring Station in the Parish of Aldbury, liable to be affected by development on the proposed sites Tr-h1, Tr-h2 and Tr-h3 to the east of Tring Town, I wish to add my support to the response submitted by Aldbury Parish Council.

Aldbury response :

**Proposed Change of site Tr-h1 (Land to the north of Station Road) from Green Belt to Residential**

The site comprises 52 hectares of agricultural land with the proposed use primarily for residential development but could also include recreational and community facilities. The landowner (Harrow Estates plc) and agent (Turley) propose a potential housing capacity of up to 1,000 dwellings but it should be appreciated that the site could contain up to 1,820 dwellings if the site is given over wholly to housing. The site does not lie within the Chilterns Area of Outstanding Natural Beauty (AONB) but is in the Green Belt. The principles of the Green Belt are set out in the National Planning Policy Framework (NPPF) (Section 9 – paras 79-92). Green Belt exists to provide open space and to prevent urban sprawl. NPPF para 79 states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence”. It is there neither to protect nor to enhance the landscape, although it may do that incidentally. The effect of building housing along Station road on this site will be to extend Tring Town geographically so that it absorbs the hamlet of Tring Station, the West Ward of Aldbury Parish. This will permanently remove the buffer zone between Tring Town and the Chilterns AONB. It will also impact adversely on visual aspects of the Chilterns AONB which covers part of the south side of Station Road opposite the site Tr-h1. The site will also adjoin the Chilterns AONB to the east if the site is developed as far as the Grand Union Canal.

Aldbury Parish Council is against the development of the site Tr-h1. It has insufficient knowledge of the Borough as a whole to be able to suggest alternative sites that should be developed instead of Tr-h1. It does in any case, as stated above, recommend Growth Option 2B with its greater focus on Hemel Hempstead. It does moreover believe that the site should be very low in the priority of sites to be considered for development in view of the loss of the buffer zone between Tring Town and the Parish and the permanent damage that would be inflicted on the neighbouring Chilterns AONB. The Parish Council does of course recognise that most of the site Tr-h1 is in Tring Town and that Tring Town Council will have its own views on priorities that it will wish to contribute. However the Parish Council does not believe that it is in the interests of the Borough or the local environment for this site to be developed. The site provides a green space that adds visual attraction to the journey between Tring Town and Tring Station and provides a much needed buffer between Tring Town

and the Chilterns AONB. This after all was the whole point of this land being designated as Green Belt.

**Potential Infrastructural Requirements if site Tr-h1 is removed from the Green Belt**

If site Tr-h1, is to be removed from the Green Belt, Aldbury Parish Council agrees in principle with the provision of a primary school, a community hall, multiple use games area (MUGA) and health centre. Shopping facilities would also be worth considering. It would be sensible for facilities to be located in the sector closest to Tring Station as the hamlet is poorly served for facilities, apart from the obvious major facility, the railway station. The existing community hall, “the Iron Room”, has limited facilities, has no dedicated off street parking and there is very limited on street parking available. The green space to the rear of the Iron Room serves as the children’s play area but is just a green space. It has to be assumed that no further car parking spaces will become available at the railway station due to Green Belt/AONB constraints. The emphasis will have to be on sustainable access, e.g. cycle/footpath links, commercial bus links and community bus links from surrounding areas. There may at some stage need to be consideration of a Park & Ride scheme depending on the scale of development approved. There would also need to be consideration given to traffic calming in the hamlet of Tring Station to take account of increased traffic volumes. There are already particular difficulties and safety concerns with access from Northfield Road & Clarkes Spring onto Station Road due to the volume of existing traffic during peak times.

Careful and detailed consideration will need to be given to the potential infrastructure requirements if all or part of site Tr-h1 is removed from the Green Belt.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15851
<b>Full Name</b>	Judith McCarthy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	As a resident of the hamlet of Tring Station in the Parish of Aldbury, liable to be affected by development on the proposed sites Tr-h1, Tr-h2 and Tr-h3 to the east of Tring Town, I wish to add my support to the response submitted by Aldbury Parish Council.  Aldbury response :



	<p><b><u>Proposed Change of sites Tr-h2 (Land west of Marshcroft Lane) and Tr-h3 (Land at Icknield Way/Grove Road (New Mill)) from Green Belt to Residential</u></b></p> <p>The site Tr-h2 comprises 4.68 hectares of agricultural land with the proposed use being for residential development. The landowner (Simon Westrope) and agent (Bidwells) propose a potential housing capacity of up to 77 dwellings but it should be appreciated that the site could contain up to 163 dwellings if the site is given over wholly to housing. It is of course for Tring Town Council to make detailed comments on the possible development as it sees fit.</p> <p>The site Tr-h3 comprises 14.66 hectares of agricultural land with the proposed use being for residential development. The landowner (RELX) and agents/developers (Gallagher Estates and Pegasus Group) propose a potential housing capacity of up to 400 dwellings but it should be appreciated that the site could contain up to 513 dwellings if the site is given over wholly to housing. It is of course for Tring Town Council to make detailed comments on the possible development as it sees fit.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15852
<b>Full Name</b>	Judith McCarthy
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of the hamlet of Tring Station in the Parish of Aldbury, liable to be affected by development on the proposed sites Tr-h1, Tr-h2 and Tr-h3 to the east of Tring Town, I wish to add my support to the response submitted by Aldbury Parish Council.</p> <p>Aldbury response :</p> <p>Aldbury Parish Council would be against the linking of sites Tr-h1, Tr-h2 and Tr-h3 to form a neighbourhood stretching from Station Road to Bulbourne Road B488. This would give a housing capacity of between 1,477 houses to 2,496 houses which would constitute gross over development. By itself the creation of a new Tring north east distributor road (connecting Station Road/Marshcroft Lane/Bulbourne Road) would not seem to provide any benefit as it will merely move traffic from</p>

	one congested road to another congested road in both directions. No one will be getting anywhere any more quickly.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15888
<b>Full Name</b>	D B Land and Planning
<b>Company / Organisation</b>	D B Land and Planning
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• DBLP support the identification of land south of Markyate (My-h1) as a potential housing site for in the region of 150 dwellings</li> <li>• In terms of the case for the allocation of the site, other parts of this document have provided a response to the detailed questions of strategy which would lead the Local Plan to a position where the site should be released from the green belt and allocated for development.</li> <li>• In terms of specifics, paragraph 47 of the Framework requires LPAs to maintain a 5- year housing land supply of specific deliverable sites. Footnote 11 to paragraph 47 sets out that: <ul style="list-style-type: none"> <li>• They should be available now</li> <li>• Offer a suitable location for development now</li> <li>• Achievable within a realistic prospect in the next five years</li> <li>• The development of the site is viable</li> </ul> </li> </ul> <p>In response:</p> <ul style="list-style-type: none"> <li>• The site is available for development now, DBLP have a controlling interest in the site which will see it come forward as a planning application, assuming the site is allocated for development.</li> <li>• The suitability of the location for development is explored in the Site Appraisal paper and the options being considered in the Local Plan</li> <li>• Dealing with deliverability within 5 years, the site's location in the green belt and reliance on the local plan being adopted prevents its immediate delivery. However, assuming prompt progress on the Local Plan, the site would be genuinely in a position to start delivery within a 5-year period from 2018. As is shown in the Site Assessment, whilst there are some technical issues with the site, they are not insurmountable barriers to development and simply need to be taken into account in terms of detailed masterplanning and layout design. To this end DBLP has appointed a full technical team of consultants to manage this process and draw-up a development proposal for the site to be discussed as part of the Local Plan process</li> </ul>

	This is a greenfield development site with few technical constraints. As a result, there are no immediate concerns regarding the site's viability.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15900
<b>Full Name</b>	Mrs Sue Yeomans
<b>Company / Organisation</b>	Chilterns Countryside Group
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>2.xi. CCG does not find creation of Suitable Alternative Natural Greenspaces (SANGs) acceptable replications of an existing, naturally beautiful, green and tranquil open landscape. Wildlife corridors, habitats and important markers such as hedgerows which have established over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.</p> <p>2.xii. Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding, dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificial, man-made green space.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15912
<b>Full Name</b>	Mrs Sue Yeomans
<b>Company / Organisation</b>	Chilterns Countryside Group
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	6.iv. Whilst developers may offer infrastructural opportunities which could support proposed developments, the CCG does not accept that the balance

	of possible benefits and definite negative impacts can be considered equally weighted if such development requires release of Green Belt.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15914
<b>Full Name</b>	Mrs Sue Yeomans
<b>Company / Organisation</b>	Chilterns Countryside Group
<b>Position</b>	Chairman
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15935
<b>Full Name</b>	James Pitt
<b>Company / Organisation</b>	Gleeson Developments Limited
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Council will be aware that Gleeson Developments Ltd have an interest in site Bov h4 (land at Duckhall Farm). Our previous representations and responses to the Council's 'call for sites' have highlighted the suitability and deliverability of this site.</p> <p>We note that the suitability of the site is supported by the Council's own conclusions in its Strategic Housing Land Availability Assessment, notwithstanding the fact that the site lies within a parcel of land identified in the Stage 2 Green Belt study as being of Green Belt value. We have previously highlighted a methodological</p>

shortcoming in the Stage 2 Green Belt assessment work, in that the analysis presented relates to the various land parcels identified in that study, and in some cases (but not others), the parcel of land assessed in the Stage 2 Green Belt study are far larger than the actual parcel of land being proposed for development. This results in the Green Belt study drawing conclusions relating to broad land parcels that are not necessarily accurate or specific to the proposed development parcel. It is essential therefore that the matter of whether a site passes or fails to pass the Stage 2 Green Belt study is not a determinative factor in site selection, where the Stage 2 Green Belt study has in affected assessed the wrong parcel of land.

We also note that the Sustainability Appraisal working note contains an assessment of each site identified by the Council for consideration alongside the Issues and Options Draft, including four sites at Bovingdon, of which one is Bov h4/Duckhall Farm. Table 1 of that document presents a summary of the findings, and shows that Bov 4/Duckahll Farm performs well against the sustainability assessment criteria, and compared to the other Bovingdon sites. This is because the land at Duckhall Farm is of significantly lower agricultural quality, and in accordance therefore with paragraph 112 of the NPPF, should be preferred to other options that use higher quality land (we note that the agricultural land quality impacts of the land at Homefield have been altered since the appraisal was published at the Committee stage, but it is likely that of all the Bovingdon sites, the land quality at Duckhall Farm is the poorest). The only other difference is a '?' placed against Duckhall Farm regarding heritage, but the assessment notes that this is because the impacts were not known to the assessors at the time of the report, not because there was necessarily an adverse impact.

Turning to the fuller SA analysis for site Bov h4, we would make the following additional comments:

- 1 Biodiversity – the assessment assumes that because the site is greenfield, development must relate to loss of some habitats. The only habitat affected is grassland, because hedgerows and trees are essentially retained. Whilst it is hypothetically true that any development (even urban brownfield) results in the loss (or change) of a habitat to some degree or other, there is no evidence to suggest that development at site Bov h4 has any material impact on biodiversity;
- 1 Landscape/Townscape – the assessment states that the development would extend Bovingdon in to countryside north of the village. This conclusion is unfounded. The proposed development area at Duckhall Farm is bounded by the prison and the existing village envelope, such that no part of the proposed development area extends further in to the countryside than the existing geographic extent of the village. Duckhall Farm is the only development option at Bovingdon which does not physically extend the built up area beyond the current natural boundaries of the village.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15937
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Be-h1 - Land south of Berkhamsted (DRAFT ALLOCATION)</p> <p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15938
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Be-h2 Haslam Fields, Shootersway

	The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15939
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Be-h3 - Land at Ivy House Lane (DRAFT ALLOCATION) The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15940
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Be-h4 - Land between Durrants Lane / Darrs Lane / Bell Lane (two sites) (DRAFT ALLOCATION) The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage

	<p>infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15941
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Be-h5 - Land at Lockfield, New Road, Northchurch (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p> <p>There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15942
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Be-h6 - Land adj. to Blegberry Gardens, Shootersway (DRAFT ALLOCATION) The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15943
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Be-h7 - Land at Bank Mill Lane (DRAFT ALLOCATION) The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15944
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	Be-h8 - Berkhamsted Golf Range, The Brickworks, Spring Garden Lane (DRAFT ALLOCATION)  The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15945
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Bov-h1 - Land at Grange Farm, Green Lane (DRAFT ALLOCATION) (Reviewed Nov17)  The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15946
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Bov-h2 - Land south east of Homefield (Reviewed Nov17)

	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p> <p>The total development identified in the sewerage catchment draining to Church Street SPS within the Dacorum development plan would cause concern if all developments were to go ahead.</p> <p>Thames Water would welcome early consultation concerning any proposed development and once the scale and phasing of overall development in the catchment is known. Adjacent development sites are encouraged to use a consortia led approach so that cumulative detriment to the existing sewerage infrastructure can be avoided.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15947
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Bov-h3 - Land r/o Green Lane / Louise Walk (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15948
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Bov-h4 - Land at Duckhall Farm, Newhouse Road (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p> <p>Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the cumulative total development identified in the Bovingdon area within the Dacorum development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation with details of the proposed build programme and drainage strategy.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15949
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>HH-h1 - North Hemel Hempstead (Phases 1 &amp; 2) (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO15950
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>HH-h1a - North Hemel Hempstead (Phase 1) (DRAFT ALLOCATION)</p> <p>Infrastructure at the wastewater treatment works in this area may be unable to support the demand anticipated from this development. Minor infrastructure upgrades maybe required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build</p> <p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Developers are advised to liaise early on with TW to discuss the scale and timing of their development and the infrastructure requirements, without early discussions there will be an increased risk of Thames Water seeking phasing conditions.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15951
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>HH-h2 - North of Gadebridge (Land at Piccotts End) (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage</p>

	<p>infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15952
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>HH-h3- Land at Shendish, London Road (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15953
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-h1 - Land at Hill Farm, Love Lane (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity</p>

	constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15954
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-h2 - Land at Rectory Farm, Hempstead Road (DRAFT ALLOCATION)</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>A significant asset runs beneath the site. We would seek protection of these assets and may require several wayleaves / easements</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15955
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>KL-h3 - Land to the east of A41 and Wayside Farm, Watford Road (DRAFT ALLOCATION)</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>A significant asset runs beneath the site. We would seek protection of these assets and may require several wayleaves / easements</p>
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO15956
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My-h1 - Land south of Markyate (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15957
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My-h2 - Land at Pickford Road (DRAFT ALLOCATION)</p> <p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p> <p>We have no concerns on the basis there won't be any surface water connection to public sewer.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15958
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	O-h1 - Land at Old Kiln Meadow, Water End Road, Potten End (DRAFT ALLOCATION)  The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15959
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	O-h2 - Land to the north east of Grange Road, Wilstone (DRAFT ALLOCATION)  On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15960
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Tr-h1 - Land to the north of Station Road (DRAFT ALLOCATION)  Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning

	<p>Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15961
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Tr-h2 - Land west of Marshcroft Lane (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15962
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Tr-h3 - Land at Icknield Way / Grove Road (New Mill) (DRAFT ALLOCATION)</p> <p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15963
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Tr-h4 - Land at Cow Lane / Station Road (DRAFT ALLOCATION)</p> <p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application</p>

	Thames Water would advise that with regard to foul water sewerage infrastructure we would not have any concerns with this individual development site. However, the cumulative total development identified in the Tring area within the Dacorum development plan may cause concern if all developments were to go ahead. Thames Water would welcome early consultation with details of the proposed build programme and drainage strategy.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15964
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Tr-h5 - Land at Dunsley Farm, London Road (DRAFT ALLOCATION)</p> <p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p> <p>The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development.</p> <p>Developers are advised to liaise early on with Thames Water to discuss the scale and timing of their development and the infrastructure requirements, without early discussions there will be an increased risk of Thames Water seeking phasing conditions.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15965
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Tr-h6 - Land north of Icknield Way (Waterside Way) (DRAFT ALLOCATION)</p> <p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15967
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The total development identified in the sewerage catchment draining to Berkhamsted STW within the Dacorum development plan would cause concern if all developments were to go ahead.</p> <p>Thames Water would welcome early consultation concerning any proposed development and once the scale and phasing of overall development in the catchment is known. Adjacent development sites are encouraged to use a consortia led approach so that</p>

	cumulative detriment to the existing sewerage infrastructure can be avoided.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15968
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The total development identified in the sewerage catchment draining to Church Street SPS within the Dacorum development plan would cause concern if all developments were to go ahead.</p> <p>Thames Water would welcome early consultation concerning any proposed development and once the scale and phasing of overall development in the catchment is known. Adjacent development sites are encouraged to use a consortia led approach so that cumulative detriment to the existing sewerage infrastructure can be avoided.</p> <p>Where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in close proximity to a pumping station.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15969
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Thames Water would welcome early consultation with details of the proposed build programme and drainage strategy.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15970
<b>Full Name</b>	Katherine Jones
<b>Company / Organisation</b>	Thames Water Utilities Ltd
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	The total development identified in the sewerage catchment draining to Tring STW within the Dacorum development plan would cause concern if all developments were to go ahead. Thames Water would welcome early consultation concerning any proposed development and once the scale and phasing of overall development in the catchment is known. Adjacent development sites are encouraged to use a consortia led approach so that cumulative detriment to the existing sewerage infrastructure can be avoided.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15972
<b>Full Name</b>	Mr Robert Sellwood
<b>Company / Organisation</b>	The Crown Estate
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b><u>North Hemel</u></b> <p>Whilst Hemel Hempstead may be the most sustainable settlement in Dacorum, it is accepted that it has constraints in terms of potential directions of growth. Further growth to the east is limited by the tight boundary with St Albans and beyond that is the location of the emerging St Albans strategic allocation of East Hemel. Expansion to the south west is also limited by topography, landscape, the Gade Valley, the railway line and the A41.</p> <p>These constraints leave North Hemel as the only realistic direction for the town to grow. The Crown Estate owns the freehold of an extensive area of land to the east of Leighton Buzzard Road and is in active</p>

	<p>discussions with other landowners around the northern side of Hemel Hempstead. The TCE land is available for development and is of a sufficient size that it could provide the first phase of a wider North Hemel strategic development area.</p> <p>TCE has assembled a team of consultants which is currently working on a master plan for the site. An initial concept master plan for both phase 1 and the wider area has been prepared by Scott Brownrigg. This can be seen as Appendix 2 of this letter and demonstrates how phase 1 could deliver around 3,000 homes by 2036.</p> <p>The main features of the concept are :</p> <ul style="list-style-type: none"> <li>• focussing development in the shallow bowl between the existing edge of Grove Hill / Woodhall Farm and the AONB</li> <li>• a significant recreational and nature conservation buffer between the development area and the AONB</li> <li>• a new route between Leighton Buzzard Road and Redbourn Road.</li> </ul> <p>The development would also provide a comprehensive range of social and physical infrastructure. This would include open space, primary education, a local centre and community facility. Ultimately, the full development would be of a size that could support a new Secondary School, if that was favoured by Hertfordshire County Council, as Education Authority.</p> <p>The Crown Estate and its consultant Team would welcome the opportunity to work with officers, Members and the local community in bringing this exciting proposal to fruition.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO15997
<b>Full Name</b>	Mr Robert Sellwood
<b>Company / Organisation</b>	The Crown Estate
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Crown Estate (TCE) has land interests in site HH1-h1a and is in discussion with landowners in HH1-h1b. TCE has previously submitted information on both sites via the 'call for sites' process.</p> <p><b>Attached to this response is an updated concept framework document for North Hemel prepared by Scott Brownrigg.</b></p>
<b>Include files</b>	<a href="#">Bob Sellwood - Local-plan issues and options consultation pdf.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO15998



<b>Full Name</b>	Charlotte Ryan-Elliott
<b>Company / Organisation</b>	Kier Property
<b>Position</b>	Planner`
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Kier Property own the Site located one site back from the corner of St Albans Road and Maylands Avenue, Hemel Hempstead and wish to promote its release from the existing 'Employment Land' allocation in order to redevelop the site for residential purposes. The Site, identified on the Site Location Plan included at Appendix 1, measures approximately 1 ha and is bound by employment land to the north, open vacant land to the east, residential areas to the west and a hotel (Travelodge) and franchise restaurants (Toby Carvery, Subway and Dominos) with associated car parking to the south. The Site is located 2 miles east of Hemel Hempstead, on the residential periphery of the town.</p> <p>Our client considers that the land at Kier Park, which has sat vacant for a number of years, represents an important opportunity for new residential dwellings in order to assist in meeting the borough's significant housing needs, and is capable of delivering up to approximately 300 new homes. Development in this location forms a logical residential extension, in a highly sustainable location. The future residents would be well served by the comprehensive range of facilities within Hemel Hempstead, as well as sustainable transport links to the rest of the borough and London.</p> <p>Having reviewed the current consultation document, we provide comments below on a number of aspects of the current Issues and Options consultation document, having regard to the ambitions of the borough.</p> <p>These representations will introduce our Client's site, outlining its suitability for residential development before exploring in detail the housing demand of the Borough and critiquing the identified supply. Our representations will provide a response to the I&amp;O and the development options it sets out. Notably the representations will present a case for Employment Land release and identify the benefits of including Kier Park as a housing allocation.</p> <p>Our analysis finds that the Land at Kier Park, represents a valuable opportunity to assist in meeting Dacorum's housing requirement for the Plan Period, and can make a welcome early contribution within the first 5 years following adoption of the Local Plan.</p> <p>Planning Potential Limited ('Planning Potential') are appointed by Kier Property (referred to hereafter as 'Kier' or 'our Client') to advise on town planning matters relating to its commercial interest in the land located at Kier Park, Maylands Avenue, Hemel Hempstead ('the 'Site'). A Site plan is included at Appendix A1.</p> <p>1 Land at Kier Park</p>

Prior to responding directly to the I&O consultation draft and the evidence base on which it relies, we consider it important to set out the purpose of our submission. Our Client, Kier Property, owns the land at Kier Park, Hemel Hempstead. Having assessed the suitability of the Site for residential development, we consider the Site to present a good opportunity to make a positive contribution to housing supply in Dacorum.

On behalf of our Client, we have also duly submitted the Site as part of Dacorum's ongoing 'Call for Sites' relating to the Brownfield Register. The Brownfield Register submission which included a Site Location Plan, Pro-Forma and Covering Letter, outlines the Sites suitability for inclusion on the Brownfield Register and is to be further supported by these representations

In this chapter, we now set out the Site context, planning history, key designations, assess the Site's contribution to the Employment Land allocation and draw conclusions as to the suitability of the Site for release

### **Site and Surrounding Area**

The site is located one site back from the corner of St Albans Road and Maylands Avenue, Hemel The site measures c1ha. All vehicular access is via Maylands Avenue, abutting the site to the east. The site adjoins a belt of woodland to the west, beyond which is a residential area of flats and houses. The northern boundary is defined by the line of a shared footpath and cycle lane, beyond which is further employment land and a recently permitted five-storey, self-storage building (application reference 4/04095/15/MFA).

The land immediately adjacent to the site to the south is partly in use as a hotel (Travelodge) and franchise restaurants (Toby Carvery, Subway and Dominos) with associated car parking. To the south of the site, beyond St Albans Road is an established residential area

The site falls within Maylands Avenue General Employment Area (GEA) which is allocated for B1 (Business) uses within saved Local Plan Policy 31. This area is designated as a 'Core Office Location' within Policy 31.

The Site has been cleared and as such is currently vacant open land. The site does not contain buildings that are statutorily or locally listed. The site is not within a Conservation Area. The site is located within Flood Zone 1, an area with the lowest risk of flooding

### **Planning History**

The site was historically owned and operated by Royal Mail as an administration and storage More recently, planning consent was granted for a hotel and offices on the wider site, the hotel and associated restaurants have now been built out and the office consent relates to the vacant land which Kier are now promoting for residential purposes, following a lack of appetite for offices in this location. The most relevant planning history is set out below.

- 2008 - 4/00062/08/MFA - Development comprising hotel, offices, self storage, retail and residential was WITHDRAWN on 03/04/2008.
  - 2008 - 4/02124/08/MOA - Hotel and Offices was GRANTED outline permission on 18/06/2010.
- - 2011 - 4/00333/11 /ROC - Variation of Condition 12 (Details of Public Art) of Permission 4/02124/08 (Hotel and Offices) was GRANTED on 27/04/2011 to require public art details to be submitted prior to commencement of the office development rather than prior to commencement of the development
- 2011 - 4/00235/11/RES - Submission of Reserved Matters (Hotel Design, Landscaping, Layout and Scale) pursuant to outline planning permission 4/00333/11 /ROC (Variation of Condition 12 Details of Public Art) or Permission 4/02124/08/MOA was GRANTED on 18/05/2011.
- 2011 - 4/00239/11/FUL- Extension to approved access road, hard standing and relocation of electricity substation was GRANTED on 06/06/2011.
- 2011 - 4/01443/11 /NMA - Non Material Amendment application was GRANTED on 16/9/2011 to predominantly revise the floor heights to an overall building reduction of 3m and to remove overhang of the second floor over first floor west elevation
- 2011 - 4/01442/11 /ROC - Variation of Conditions 2-7, 9, 10, 13-15, 17 & 20 of Planning Permission 4/00333/11 (Variation of Condition 12) of 4/02124/08/MOA (Hotel & Offices) was GRANTED ON 27/09/2011 to allow for a phased development
- 2012- 4/00218/12/FUL- Installation of Shop Front (Toby Carvery Restaurant) was GRANTED on 06/06/2012.
- 2015 - 4/01031/15/MFA- Development of a building to comprise a Lidl food store with B1(a) Office floorspace at first floor level, with associated parking was REFUSED on 30/10/2015.
- Accordingly, under the permission 4/02124/08/MOA, the hotel was built out, but the offices were not due to a change in market demand for offices.

In June 2017, Kier Property met with Dacorum Council to present two proposals, both for the redevelopment of the site for purely residential purposes. The pre application response was positive and saw merit in the redevelopment of the site for residential purposes. Please find the full pre-application response at Appendix A2.

- The Council confirmed that the surrounding area is undergoing significant change and there have been several applications in the area that have been approved notwithstanding their departure from the development

#### **Development Potential**

- Whilst a scheme has not been finalised, initial work suggests that a scheme of circa 300 residential dwellings could be The proposal most favourably considered in the pre-application discussions considered a scheme of five buildings, located to the north and south of a primary access road that bisects the site. The northern two buildings comprise three to seven storeys and the southern buildings comprise eight storeys. The development proposed 262 residential dwellings comprising 128 no. 1 beds, 108no. 2 beds and 26 no. 3 beds. Car parking is arranged at basement and ground floor level to ensure a high quality public realm is achieved; with 304 car parking spaces provided across the development site. Communal residential amenity space is centrally located in podium gardens with private amenity space provided in balconies. This option pursues a contemporary design and would take its inspiration from the wider established residential vernacular.

#### **Loss of Employment Land**

- Whilst we acknowledge that the site falls within Maylands Avenue General Employment Area (GEA) which is allocated for B1 (Business) uses within saved Local Plan Policy 31, and defined as a 'Core Office Location' within Policy 31, it is evident that the Council's policy for the site and the wider Maylands Business Park was prepared in a different economic environment and that the position for high quality office accommodation has Recent planning decisions have relied upon this within their supportive evidence and have justified a departure from the plan.
- Following pre-application advice sought, in June 2017, in relation to the redevelopment of the site for residential development, the Council confirmed

that marketing evidence would need to be presented, in order to provide justification as to the diversion from the Local Plan, to allow housing in this location. Accordingly Kier have undertaken the required period of marketing and have found there to be no appetite for employment uses in this location

- Council's Authority Monitoring Report 2015/16 (AMR) states in paragraph 6.28 that:

*"A substantial net loss of office floorspace is expected over the Core Strategy plan period and that the major floorspace increase proposed in Policy CS14 will not be achieved unless additional land is allocated. The main reason is that much less office development is expected at Maylands Gateway than envisaged when the Core Strategy was produced."*

- During pre-application discussions the Council acknowledged that the office market is dwindling and that their housing need is likely to significantly increase, which it subsequently has done
- Furthermore, the site is located on the periphery of the employment land designation and the changing nature of the surrounding area supports the removal of the existing allocation, in favour of a residential allocation or a residential planning permission

#### **Sustainable Development**

- The site is also sustainably located with good links to the town centre and wider area. Extensive studies have shown tremendous potential to implement a clearly defined cycle and pedestrian network within the Maylands area. A cycle route currently exists running north along Maylands Avenue to the east of our site, and there is a pedestrian linkage to the north. Future proposals to upgrade this network as depicted in the Maylands Masterplan show a proposal to improve the pedestrian and cycle crossings where Maylands Avenue meets the A414. This proposed new connection will directly connect any proposed new development on our site to the potential new food retail site on the east of Maylands Avenue

- These future proposals also seek to open up the east-west route on the north of our site to cycle traffic, providing the potential to link our site to the town centre in the west by a safe cycle route.
- There are currently several bus routes which run along Maylands Avenue providing connections to Hemel Hempstead town centre, railway station and general hospital. There are also existing bus links to St. Albans and Watford which run near to the Car access to Junction 8 of the M1 is easily achievable from our site, with the site being within less than 2km of Junction 8.
- The Maylands Masterplan contains proposals for future enhancements to the public transport network within the Maylands area. Of particular note is the proposed town centre and station bus route which loops around the Maylands district providing regular buses to the town centre and directly to the station. This proposed route passes our site along Maylands Avenue, and could therefore serve to provide transport links from our site to: The Maylands industrial area, Hemel Hempstead Town Centre, and Hemel Hempstead Train Station
- The National Planning Practice Guidance (PPG) confirms that an assessment of land availability should identify a future supply of land which is suitable, available and achievable over the plan period. The following paragraphs demonstrate how the land at Maylands Hemel meets these three criteria

#### Suitability

- Paragraph: 019 Reference ID: 3-019-20140306 of the NPPG sets out guidance on how sites can be considered suitable. In addition to the site's location being guided by the development plan, emerging plan policy and national policy, together with the

market and industry requirements, the following should also be taken into account:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas
- In light of the above, the site is located in a highly accessible location, with established infrastructure and no evidence of any other major site constraints which could be of detriment to the development potential of the site. The surrounding area is lends itself to residential uses being bought forward, with a mix of residential, industrial and a hotel all within the immediate surroundings
- In terms of the regeneration potential of the site under existing policy, the Core Strategy sets out a target of 1,000 homes in the Maylands Business Park area, with figure 18 of the Core Strategy setting out 250 homes for the Heart of Maylands. The Site Allocations Plan sets out that the East Hemel Hempstead Area Action Plan will identify c550 dwellings at Spencer Park and c400 at the Heart of Maylands. 357 dwellings have been permitted (RM-4/02351 /13) for

land adjacent to Nickey Lane and several planning applications have been approved for residential development in the Heart of Maylands for 130 homes (4/00676/14/MFA) and 79 homes (4/03252/15MFA) and therefore the regeneration of the local centre and residential use is progressing.

- The Maylands Gateway Development Brief confirms that c250 homes are planned for in this area, but are considered more appropriate at land east of Hales Park. However, we considered that the site is suitable for residential development, given the existing residential development to the west, the site's proximity to the new local centre at the Heart of Maylands and given the future offer at land adjacent to the east

#### Availability

- Paragraph: 020 Reference ID: 3-020-20140306 of the PPG states that "A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners"
- There are no issues relating to availability of the site that would impact upon its delivery for housing. As noted, our Client owns the freehold of this site, and considers it available for development in the short term



	<p style="text-align: right;"><u>Achievability</u></p> <ul style="list-style-type: none"> <li>Paragraph: 021 Reference ID: 3-021-20140306 of the PPG states that "A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period."</li> </ul> <p>Kier Property are a highly reputable company with an established record of delivering sites for residential development. An application for residential development on this site could be progressed and submitted in the near future. Should the site be successfully permitted for development by way of an application, allocated and or given permission in principle, it is anticipated that delivery of homes could be achieved within the next 5 years.</p> <ul style="list-style-type: none"> <li>In this context, we consider that the Land at Kier Park, represents a valuable opportunity to assist in meeting Dacorum's housing requirement for the Plan Period, and can make a welcome early contribution within the first 5 years following adoption of the Local Plan, if not before. The Site forms a logical residential extension, given the neighbouring residential uses, accordingly up to 300 homes could be delivered without the harmful impacts associated with alternative options discussed within the I&amp;O. Furthermore, the site is not subject to any significant environmental constraints that would preclude residential development, and thus, would be capable of delivering a high-quality development in this suitable and sustainable location.</li> </ul> <p>APPENDIX 1 Kier Park, Maylands Avenue, Hemel Hempstead, HP2 4SQ</p>
<b>Include files</b>	<a href="#">Charlotte Ryan-Elloitt Kier Park - Appendicies document.pdf</a>
<b>Number</b>	Question 46

<b>ID</b>	LPIO16014
<b>Full Name</b>	Charlotte Ryan-Elliott
<b>Company / Organisation</b>	Kier Property
<b>Position</b>	Planner`
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>We consider that the draft schedule of sites is not extensive enough and does not suitably assess the contribution Brownfield sites could make to meeting housing needs. As set out throughout this report we consider the land at Kier Park should be considered suitable for the delivery of housing and as such we strongly consider it appropriate to be included on the draft Schedule of Sites.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16018
<b>Full Name</b>	R. Wisemann
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: it will ruin the village
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16027
<b>Full Name</b>	Maria & Colin Sturges
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I believe the proposed Local Plan lacks vision and fails to keep the character of Dacorum. Less than 6 months ago (16th July) the previous 25 year plan was approved and that took 10 years in the making, and now we are being asked to approve a new plan having just agreed to an additional 500 houses in Tring. If the worst case scenario of the plan were to take place this would result

	<p>in a 60% increase of the town of Tring. I have attached a report from a planning consultant with regards to the over-development of Tring. Tring has specific issues being a small market town:-</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16030
<b>Full Name</b>	Mrs H. Hartley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The appeal to residents and visitors to Kings Langley is the green area surrounding the village.</p> <p>More houses will put more pressure on local facilities and create more traffic and less parking.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16039
<b>Full Name</b>	Dave Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO16042
Full Name	Dave Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary</p>

to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..."* (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments...  
[however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."  
(Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

#### **Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in

preference to that of a higher quality." 20 (Emphasis added)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.



23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations...</i>"<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16087
<b>Full Name</b>	Dave Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find the attached document describing issues and options that I and many other residents of Tring have addressed regarding housing development</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "...<i>about 2500 new homes and 55ha of new employment land...</i>" and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p>

	<p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16095
<b>Full Name</b>	Helen and Aaron Talbot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>

Number	Question 46
ID	LPIO16142
Full Name	Helen and Aaron Talbot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16144
<b>Full Name</b>	Helen and Aaron Talbot
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We attach the report commissioned by Grove Fields Residents Association which we believe should be taken into consideration with regards to proposed plans for increased housing for Tring. We are a small town and the plans for huge new housing developments (some on Green Field sites) should be considered in the light of this.</p> <p>Furthermore we cannot see our present infrastructure - roads, schools, doctors surgeries etc coping with the proposed new residents and their cars</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our <i>"feedback"</i> regarding the sites contained in the <i>"draft schedule of site appraisals"</i> and the <i>"sustainability appraisal"</i> of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the <i>"Issues and Options consultation Local Plan to 2036"</i> refers to <i>"Gorhambury Land at East Hemel Hempstead"</i> (<b>East Hemel Hempstead</b>) and states the area will provide <i>"...about 2500 new homes and 55ha of new employment land..."</i> and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead</p>

development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa

0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." *20 (Emphasis added)*

*19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".



The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "*High...Medium...[or]...Low*" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "*Green Belt Parcel Numbers*", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "*...of poorer quality...*"; and

LS Conclusions: TR-H1 should be "*excluded*" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set

out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations*..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46

<b>ID</b>	LPIO16145
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p> <p>In addition we note that the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (<b>GBR/2</b>) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p>

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

17 See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105

18 Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

#### **Location**

#### **Use**

#### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa 0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way (Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given

	<p>the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and</p> <p>TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.</p> <p><u>Conclusion</u></p> <p>In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating <b>TR-H5</b> and <b>TR-H6</b> would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.</p> <p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations...</i>"<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16153
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.



	<p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16201
<b>Full Name</b>	Stuart Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached report which I fully endorse. There seems to be a complete lack of vision in the proposals and lack of concern about what it will do to the infrastructure of the town.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East</b></p>

	<p><b>Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16210
<b>Full Name</b>	Stuart Mears
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</b></p> <p><b>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p>

	<b>GFRA full document attached</b>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16253
<b>Full Name</b>	Stuart Mears
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</b></p> <p><b>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our <i>"feedback"</i> regarding the sites contained in the <i>"draft schedule of site appraisals"</i> and the <i>"sustainability appraisal"</i> of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the <i>"Issues and Options consultation Local Plan to 2036"</i> refers to <i>"Gorhambury Land at East Hemel Hempstead"</i> (<b>East Hemel Hempstead</b>) and states the area will provide <i>"...about 2500 new homes and 55ha of new employment land..."</i> and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt</p>

surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added)In

addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "*...exceptional circumstance...*" in accordance with the NPPF to "*...justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above,

therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa 0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way (Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." <sup>20</sup> (*Emphasis added*)

<sup>19</sup> See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

<sup>20</sup> The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3").

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green

*Belt Parcel Numbers*", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and

in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations...*"<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16260
<b>Full Name</b>	Stuart Mears
<b>Company / Organisation</b>	
<b>Position</b>	



Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I write in regards to your "Issues and Options Consultation Local Plan to 2036".</p> <p><b>I fully support the analysis and conclusions of the Issues and Options Response prepared by the Grove Fields Resident Association.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO16261
Full Name	Mr Ian Chapman
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>(1) Where is the travel plan for all these proposed houses?</p> <p>(2) Watford General Hospital cannot cope - we need a new hospital urgently</p> <p>I strongly object to building on Green Belt in and around the Parish.</p> <p>Our beautiful village will be spoilt from <u>any</u> more traffic. Philip Hammond said in Budget "continuing the strong protection of our Green Belt"</p>
Include files	
Number	Question 46
ID	LPIO16264
Full Name	A. Howell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Settlements would merge and the character of the village would be harmed.</p>
Include files	
Number	Question 46
ID	LPIO16272
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>please find the attached report written on mine and other residents request.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already</p>

	<p>been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16319
<b>Full Name</b>	Kitty Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>please find the attached report written on mine and other residents request.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "<i>...about 2500 new homes and 55ha of new employment land...</i>" and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved...</i></p>

	<p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area...</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16321
<b>Full Name</b>	Kitty Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>please find the attached report written on mine and other residents request.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p>

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant*"

*consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.

18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England,

2014, *An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")*.

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "*High...Medium...[or]...Low*" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "*Green Belt Parcel Numbers*", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.



In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations...*"<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO16323
Full Name	Kitty Thomas
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>please find the attached report written on mine and other residents request.</b></p> <p>I have attended several meetings and written to Dacorum Council expressing my objections to proposed plans re fields off grove road and Icknield way. These objections still stand. this is green belt land in an area of outstanding beauty and should not be built on. Also we are losing a lot of Trings infrastructure which would support additional housing and infrastructure that does exist cannot support further residential development</p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO16324
Full Name	Aaron Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I Strongly oppose the propos-ed development of Tring, No. 1 Area of outstanding natural beauty and building would greatly affect wildlife.</p> <p>No. 2 Tring is a small Town that doesn't have the infrastructure to take more people, we dont even have a BANK.</p> <p>I support GFRA responses.</p>
Include files	
Number	Question 46
ID	LPIO16332
Full Name	Aaron Smith
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support GFRA responses see below.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO16335
Full Name	Aaron Smith
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support GFRA responses see below.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary</p>

to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..."* (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments...  
[however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."  
(Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD105
  - Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

#### **Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in

preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.



	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations...</i>"<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16381
<b>Full Name</b>	Aaron Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I support GFRA responses see below.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "...<i>about 2500 new homes and 55ha of new employment land...</i>" and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p>

	<p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LP1016389
<b>Full Name</b>	Ruth and Stephen Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>The Berkhamsted Residents Action Group (BRAG) have responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, we request you accept this as confirmation that we wish DBC to duplicate BRAG's responses under our name.</b></p> <p>However, we would like to take this opportunity emphasize just a few of the most important points within that response.</p> <p>Q 46. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>Question 46</b>      <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant ongoing and planned developments.</p>

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(http://www.stalbans.gov.uk/2016/04/20/DBC-Green-Belt-Review-FCS-Mind)~~  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction

in commercial viability of 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

### **The Emerging Core Strategy states:**

#### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

#### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

#### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1).

Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

##### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not

sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the

grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either



massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not

contribute to community cohesion or sustainable prosperity

- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Proximity to Chilterns
  - Strong countryside/Green Belt boundary would be breached
  - Impact on valley sides and important dry valley location
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
  - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to

the north leading to a junction with The Common at a point near to a hazardous junction

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of

Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16430
<b>Full Name</b>	Mrs Jean Perkins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: They are totally unsustainable (1) Roads incapable of coping with increased traffic congestion (2) Services i.e. doctors, dentists, etc (3) Non existant parking (4) Kings Langley would be swallowed up as a Watford or Hemel suburb
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16431
<b>Full Name</b>	Joanne Swan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: (1) Wayside Farm a good cattle raising for milk and meat will go no area for replacement (2) Buildings on the common will need more services than can be provided locally - increasing traffic problems which are even now causing difficulties for local shops (3) Provision for old people is unfriendly (4) Plans destroying family life
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16432
<b>Full Name</b>	Gloria Shaw
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: It will greatly add to an already heavily congested road system I wish to preserve Kings Langley as a village and not a town It creates urban sprawl



	It uses Green Belt land when other more suitable land could be used
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16434
<b>Full Name</b>	Mr Alan Johnson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Shendish within Kings Langley. DO not want development at Shendish</p> <p>(1) Location includes Grade 2 listed residence</p> <p>(2) Possible flooding and ground slip as steep on hill with chalk sub so I ground</p> <p>(3) Encroaching into Apsley / Hemel Hempstead</p> <p>(4) Overload of traffic on A4251 now congested at peak times (no traffic survey done on proposed developments?)</p> <p>(5) Loss or part loss of golf course reduce leisure facilities in the area and may affect hotels revenue resulting in staff reductions</p> <p>(6) Loss of natural habitat for badgers/fox/dear/birds. An area unoccupied for 70 years natural growth and development</p> <p>(7) Possible archaeological areas</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16435
<b>Full Name</b>	Mrs Sheila Lawrence
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The no. of properties proposed is totally disproportionate to the present village + surroundings. There is already too much traffic on the 4251 + often becomes gridlocked.</p>

	<p>The commuter trains are already overfull + there's a dearth of parking.</p> <p>Flooding issues in Apsley would be increased.</p> <p>The historical site of Shendish Manor and Apsley Manor Farm should be protected.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16436
<b>Full Name</b>	Joanna Pearson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Kings Langley is already very congested with traffic.</p> <p>Green Belt is vitally important to protect - and Wayside Farm provides a valuable community resource - that is unique in Hertfordshire. We need to protect Wayside!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16437
<b>Full Name</b>	Mr David Gladstone
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The road systems would not cope and chaos would be caused due to congestion making it difficult to get to work and school</p> <p>Building on Wayside Farm land should be out of the question. The farm itself has become an attraction for families and a wider community and the footpaths allow for splendid walks and views giving a vital link between Abbots Langley and Chipperfield and beyond.</p> <p>This increases the recreational opportunities for the wider community</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16438

Full Name	Mr S. Judd
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Although there is a need for housing, the development that has been proposed is far in excess than the village can take.</p> <p>The volume of traffic in the area already is at a peak with queues going back to the M25 in the rush hour and there are no other routes that can alleviate the situation.</p> <p>The village is unique and there is concern that it will merge into Hemel / Watford</p> <p>Shendish Manor is part of Kings Langley and not Hemel Hempstead as indicated in documents.</p>
Include files	
Number	Question 46
ID	LPIO16439
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East</b></p>

**Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..."* (Emphasis added) In addition, **GBR/2** concludes that it identified:

*"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."* (Emphasis added)

## Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

## Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- *Ibid*, 17

## ALC Conclusions Table

### **SSA Site Reference**

#### **Location**

#### **Use**

#### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural  
Grade 2  
TR-H2  
Land West of Marshcroft Lane  
Agricultural  
Grade 2  
TR-H3  
Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural  
Grade 2  
TR-H4  
Land at Cow Lane  
/ Station Road  
Maintained Open Land  
Grade 2  
TR-H5  
Land at Dunsley Farm, London  
Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 *(Emphasis added)*

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 *The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of

any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations*..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for



	residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.  <i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16447
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16494
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p><b>Q46 – Tick YES - OFFICER COMMENT - Gorehambury</b></p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LP1016507
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p>...</p> <p><b>CCG response to question 46 full document attached to question 46</b></p> <p>2.xi. CCG does not find creation of Suitable Alternative Natural Greenspaces (SANGs) acceptable replications of an existing, naturally beautiful, green and tranquil open landscape. Wildlife corridors, habitats and important markers such as hedgerows which have established over time will disappear. The international monetary exchange rate is not in Britain's favour; it thus becomes even more essential to protect and support the nation's farmers in supplying our own food. Building over green landscapes and good quality farm land (such as that on the Eastern side of Tring) is short-sighted and ill-advised.</p> <p>2.xii. Both Berkhamsted and Tring have green spaces around the towns widely used for walking, cycling, riding, dog-walking, running and a good network of well-used public rights of way which provide access. Residents and visitors would lose what they already have free access to and instead be offered an artificial, man-made green space.</p> <p>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
<b>Include files</b>	<a href="#">CCG submission to DBC Local Plan Consultation December 2017 v1 .pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16519
<b>Full Name</b>	Andrew Yeomans
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p>...</p> <p><b>CCG response to question 46 full document attached to question 46</b></p> <p>6.iv. Whilst developers may offer infrastructural opportunities which could support proposed developments, the CCG does not accept that the balance of possible benefits and definite negative impacts can be considered equally weighted if such development requires release of Green Belt.</p>
Include files	<a href="#">CCG submission to DBC Local Plan Consultation December 2017 v1 .pdf</a>
Number	Question 46
ID	LPIO16521
Full Name	Andrew Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I endorse the attached reports from the Chiltern Countryside Group and the Grove Fields Residents Association, regarding the local plan consultation.</b></p> <p>...</p> <p><b>CCG response to question 46 full document attached to question 46</b></p> <p>6.v. It is accepted as essential for health, well-being and quality of life that green, open spaces are incorporated into the built environment. We find and welcome creation of SANGs within the urban setting where they are most appropriate, rather than as replacement of existing high-quality green landscapes and publicly accessible countryside. Hemel Hempstead would benefit from these, whereas the smaller settlements of Berkhamsted and Tring would lose the quality of green countryside and access which they already enjoy.</p> <p>6.vi. The impact of development upon the setting of the Chilterns AONB would be minimised.</p>
Include files	
Number	Question 46
ID	LPIO16570
Full Name	Ian Emmas
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p><b>Yes</b></p> <p><b>General Comment:</b></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have an ‘insignificant’ negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments.</p> <p>BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”</p> <p>In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 &amp; 2) that has proved to be a deeply flawed process (see <a href="https://www.stalbans.gov.uk/2018/04/24/BRAG-Opinion-on-the-DBS-Minor-Review-of-the-Green-Belt-in-the-DBS-Review-2018-19/">https://www.stalbans.gov.uk/2018/04/24/BRAG-Opinion-on-the-DBS-Minor-Review-of-the-Green-Belt-in-the-DBS-Review-2018-19/</a> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a</p>

pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**At the consultation stage of the Core Strategy, Dacorum Planning Department make a number of strong statements of principle relating to the Berkhamsted Spatial Strategy which are being overturned in the current proposals without reason or explanation. Many of the sites now proposed are specifically identified in the Berkhamsted Vision Diagram as being “Sensitive Valley Sides”.**

**The Emerging Core Strategy states:**

**Built Character**

- . The open valley sides would be particularly sensitive to the effects of new development.
- . Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density.

**Key views**

- . The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

**Berkhamsted Vision**

- . New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town,

the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

. The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.

. The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation area. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

. Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is delivered. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### **Economic prosperity**

. Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening



economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

**Importantly the Core Strategy (endorsed by Councillors) rejected a number of sites in Berkhamsted giving detailed reasons for rejection – yet just a few years later Dacorum planning are ignoring these reasons without explanation and putting these very sites forward for development. The reasons previously given for rejection still hold good and itemised under each of the sites below.**

#### **Comments on individual sites**

#### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- . Strong countryside/Green Belt boundary.
- . Development would be highly visible from this prominent ridge top location.
- . Erosion of buffer between bypass and existing built up area.
- . Poor relationship to town centre services and facilities, employment land and station.
- . Important transition area between the town and open countryside would be damaged.
- . This could also set a precedent for further development of land southwards to the A41.
- . Not well related to existing housing.
- . Visual impact on important gateway to town from A416 and A41.
- . Proximity of A41 bypass.
- . Potential impact on the setting of Ashlyn's Hall.

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the

site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.”

Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- . Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- . The loss of productive farm land.
- . Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- . The land is not well related to existing services and facilities in the town centre.
- . Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- . Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- . Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- . Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- . The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it.
- . Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- . The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale

infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- . Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- . Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- . Parts of this ridge top location would be highly visible from AONB land and intrusive
- . Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- . Suggestion of new primary school – rejected by DBC at Core Strategy Inquiry. Does not fit with education strategy.
- . Secondary school places inadequate
- . Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'

. Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.

. Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.

. Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.

. Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

. Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten

minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- . Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- . **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car.”

- . Berkhamsted railway station and commuter line to Euston is already at full capacity.

- . Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option

- . Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

- . GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices

- . Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted

- . Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including

Long Green wildlife site and Brickhill Green wildlife site

- . Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution.

- . Suggestions of managed woodland doubtful – who would have responsibility

- . Area of Archaeological significance affects part of the land

- . Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

#### **Be-h2 Haslam Fields, Shootersway**

#### **Core Strategy identified the following reasons against development on this site**

- . Site is insufficient on its own, but could be phased with other land.

- . Site is part of the open transition area between the town and the wider countryside.

- . New building could set a precedent for further development of land southwards to the A41.

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

#### **In addition BRAG makes the following objections**

- . Identified in Site Appraisal as – Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult

- . Cumulative negative impact on Berkhamsted infrastructure with little contribution

- . Likely to become another commuter area contributing nothing to vibrancy and vitality of the town

- . Increased car use and growth in level of greenhouse gas emissions

- . Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4.

- . Inadequate capacity of Shootersway – the impact of any development on road capacity must be assessed alongside the cumulative impact of

ongoing development, that already planned for and any other proposed development along Shootersway.

- . Located near A41 – noise levels and car emissions could affect health and wellbeing
- . Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- . Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- . Continues ‘domino effect’ of development along the ridge top that DBC was warned about
- . Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- . Potential archaeological remains
- . Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- . Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

### **Be-h3 Land at Ivy House Lane**

**Core Strategy rejected this option for the following reasons**

- . Proximity to Chilterns AONB.

- . Strong countryside/Green Belt boundary would be breached.
  - . Impact on valley sides and important dry valley location.
- In addition BRAG makes the following objections**
- . Fails to meet Berkhamsted Vision
    - o facilities and services not accessible
    - o Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - . Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - . Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - . AONB currently separated from development at Hunters Park by this open agricultural area
  - . Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - . Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
  - . Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.
  - . Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges.
  - . Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - . No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children



- . Poor accessibility to schools and all other facilities
- . Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- . Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
- . Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- . Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

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

**Core Strategy rejected this option for the following reasons**

- . Strong countryside boundary.
- . Impact on landscape/Chilterns AONB.

- . Impact and visibility of development on valley sides.

- . Poor relationship to town centre services and facilities, employment land and station.

**In addition BRAG makes the following objections**

- . Fails to meet Berkhamsted Vision

  - o facilities and services not accessible

  - o Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided highly unlikely

- . Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance

- . Parking at Northchurch already insufficient – no capacity for additional cars from ridge top

- . Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- . No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- . Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys

- . Site falls within area of Archaeological significance

- . Adjacent to Chilterns AONB

- . Suggestion of potential new primary school – not part of Berkhamsted education policy

- . Lack of secondary school capacity – Ashlyns School

- . Same arguments on accessible housing – distance from facilities and services
- . Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

. Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

**Be-h5 Land at Lockfield, New Road, Northchurch**  
**Core Strategy identified the following reasons against development on this site**

- . Site is insufficient on its own, but could be phased with other land.
- . Some distance from the town centre.
- . Next to the Chilterns AONB.
- . Site is too small to offer scope for additional town-wide leisure space.
- . The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
- . Visually prominent site.
- . Proximity to railway line.
- . Impact on setting of the canal.

**In addition BRAG makes the following objections**

- . Close to canal – undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”

- . Close to Northchurch AQMA
- . Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
- . Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
- . Noise from railway
- . Distance from town centre services and vital facilities

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

**Core Strategy identified the following reasons against development on this site**

- . Some distance from the town centre.
- . Important transition area between the town and open countryside.
- . New building could set a precedent for further development of land to the A41 bypass.
- . Site is too small to offer scope for additional town-wide leisure space.
- . Very close to the A41.

**In addition BRAG makes the following objections**

- . Fails to meet Dacorum or Berkhamsted Vision
  - o facilities and services not accessible
  - o Public transport cannot be used and provision for walking and cycling not viable – suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- . Situated at ridge top location at a distance from employment, retail, health and community services.
- . Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- . Site of archaeological significance
- . Not recommended for removal from Green Belt
  - o Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution.

Additional traffic created by the site could add to existing problems in the AQMA at Northchurch

- . No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car

- . Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

- . Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

#### **Be-h7 Land at Bank Mill Lane**

#### **Core Strategy rejected this option for the following reasons**

- . Encroachment of the urban area along the valley bottom and into adjoining open countryside.

- . Distance from the town centre services and facilities, employment land and station.

- . Impact on setting of the River Bulbourne.

- . Reduction in the degree of separation between the town and Bourne End

#### **In addition BRAG makes the following objections**

- . Expansion of town to east – would significantly alter Gateway to Berkhamsted

- . Located in Berkhamsted Conservation Area

- . Impact on adjacent AONB
- . Risk of flooding identified in assessment
- . Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- . Suggestion of provision of local play space – edge of town not a practical site
- . Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- . Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services – residents won’t be walking and cycling to the town

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

- . Site appraisal recommends exclusion from further assessment and retain as green belt
- . Site lies within CAONB – large-scale development opportunities to be avoided
- . At a distance from immediate urban edge and would extend town further into countryside
- . Close to ancient woodland
- . Loss of leisure facility
- . Ridge top – Poor accessibility to employment, retail, health and community services – no public transport – increased car usage
- . Impact of additional traffic onto Shootersway and potentially in Northchurch – Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- . Fails to meet Dacorum or Berkhamsted Vision
  - o facilities and services not accessible
  - o Public transport cannot be used and provision for walking and cycling not viable – too far for residents to walk to and from the town
- . Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.

	<p>Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16571
<b>Full Name</b>	Jennifer Fleming
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The green belt provides shelter and food for wildlife trees wild plants, locally produced food.</p> <p>Water drainage clean fresh air invaluable for well being and health as adults and children get back to nature, walking and camping, playing in natural vegetation.</p> <p>Wayside Farm is a valuable asset to the village providing healthy raw milk and local produce. Wayside Farm is the only working dairy farm in the area, giving many an insight into life on a farm and seeing the animals that give them milk. Walking through the fields and watching the crops being harvested.</p> <p>In the budget Government pledged to protect green belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16572
<b>Full Name</b>	mr Ian Passey
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It would mean Kings Langley would cease to be a village environment. It would become a ribbon development of either Hemel or Watford.</p> <p>There would be traffic congestion along the whole of the A4251 from Two Waters to the M25 - at present it can take 15 minutes from Sainsburys to Two Waters (and I don't drive at peak times)</p> <p>I don't think Shendish is sustainable for the volume of houses proposed as there is poor access.</p> <p>I regularly walk through Wayside Farm and Shendish from Kings Langley and the country should keep these free amenities.</p> <p>I don't agree with proposed office space in Kings Langley - offices are being redeveloped into housing right now in Home Park</p> <p>Brownfield must be used for housing if required - Bovingdon Airfield would seem to be a site for redevelopment</p> <p>Finally where is the money coming from for the infrastructure in the plan?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16581
<b>Full Name</b>	Cllr Rene De Silva
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I refer to the site appraisals document, and in particular site HH-H3 (Shendish)</p> <p>I am opposed to the plan for developing the Green Belt site:</p> <p>(1) There is a threat of Hemel Hempstead swallowing and merging with Rucklers Lane and Kings Langley generally</p> <p>(2) 'Access' is a major problem. Access either via Rucklers Green or the garage near the bottom of Rucklers Lane. Either way Rucklers Lane and the A4251 junctions simply could not take the likely traffic.</p>
<b>Include files</b>	
<b>Number</b>	Question 46



<b>ID</b>	LPIO16582
<b>Full Name</b>	Mrs Sharon Mead
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in and around Kings Langley because:</p> <p>It is important to prevent the coalescence of the village and avoid the loss of a valuable dairy farm.</p> <p>It would have a detrimental impact on the village character</p> <p>Large scale development will increase air pollution</p> <p>Green Belt needs to be protected for wildlife and people to enjoy.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16585
<b>Full Name</b>	David and Marion Peacock
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>We cannot support the unrestricted sprawl of housing and our seperate communities from merging into one another.</p> <p>The countryside must be safeguarded from encroachment.</p> <p>Brownfield sites must be the <u>sole</u> targets for urban development.</p> <p>We need our open countryside - the 'lungs' of the planet. We need open space for agriculture and forestry: for recreation and simply to refresh ourselves with access to open ground + attractive landscapes.</p> <p>Keep Wayside Farm and Hill Farm will demonstrate this commitment to the spirit and the concept of the Green Belt.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16587
<b>Full Name</b>	Khadejah Hoinie

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Wayside Farm has become a great local attraction and a much-loved source of wholesome produce. It gives an opportunity to our children to see where their food comes from and to get close to the farm animals, who seem to be exceptionally well-cared for. It would be a great loss.</p> <p>I also believe it could serve a great purpose educationally. The processes of producing food and growing produce can more easily be studied there than in a large, intensive setting.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16588
<b>Full Name</b>	Lauren Mainwaring
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Kings Langley is a beautiful village that risks becoming overcrowded and turning into a town.</p> <p>The infrastructure that is already in place is not enough for the amount of people there is. The traffic is horrendous and the high street comes to a standstill numerous times a day already.</p> <p>Money would be better spent improving the roads and making better what is in place</p> <p>Risking losing the great community atmosphere that the village holds and the beautiful landscapes and views that the village boosts.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16589
<b>Full Name</b>	Mrs E. Nicholls
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: until all brownfield sites in Dacorum are built on, <u>NO</u> greenfield sites should be built on, or even considered.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16594
<b>Full Name</b>	Joanne Swan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	(5) Better use of space in Hemel Hempstead needed
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16597
<b>Full Name</b>	Mr Clive Turner
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Roads in and around Kings Langley blocked every morning and evening. Coalescence would result. Loss of amenity + loss of historic character + identity. I support Option 1A and wish Shendish to be included in this option having lived in the Parish of Kings Langley for 35 years at Shendish, so should not be included in south Hemel Hempstead plans.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16600
<b>Full Name</b>	Felix Schiermann
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: That would compromised the the characteristics of the individual villages which also lacking the infrastructure needed to cope with demand. Roads are already (as well as train) overloaded.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16602
<b>Full Name</b>	Mr Mark Fowler
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Kings Langley will stop being a village and become a expanded Hemel Hempstead. With thousands of new homes traffic will become even more congested through the village. Green Belt should be what it was intended to be!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16604
<b>Full Name</b>	Mrs J. Hayter
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 I moved into Kings Langley in 1972 when it was known as the village. This still continues, we need to maintain this village as it is a very special place to live.</li> <li>2 The traffic in the High Street is often at a standstill and only just manages to cope with the current volume of cars etc. More traffic will cause chaos.</li> </ol>

	3 Wayside Farm is special to the village community and it would be a great loss to all the residents
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16605
<b>Full Name</b>	Fiona Dunn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Green Belt should not be built on, brownfield sites should be used. Local services and road network will be overcrowded.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16608
<b>Full Name</b>	Mr M. J. Hayter
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 We need to maintain the village character of Kings Langley which makes it a special place to live</li> <li>2 The roads into the High Street are already too narrow to safely accommodate existing traffic</li> <li>3 The Green Belt around the village ensures we don't become part of Apsley or Hemel Hempstead</li> <li>4 Wayside Farm and it's dairy herd would be a tragic loss to both residents and the local community.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16609
<b>Full Name</b>	Mr David Holwell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The suggested sites in the consultation document will add to the existing problems that Kings Langley faces daily.</p> <p>More traffic more pollution!</p> <p>Kings Langley will cease to be a separate community, swallowed up by the urban sprawl of development for the worse!!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16610
<b>Full Name</b>	Mrs Joan Cowley
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I feel we will lose our status as a village and with it our village community spirit, along with the sad loss of our green open spaces, wildlife and long established footpaths, etc.</p> <p>Also what about our roads, schools, doctors, hospitals, etc - already full to capacity.</p> <p>I agree we need some housing which is affordable for our young people + ask that this be done by pursuing the idea of using existing, brown-field sights.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16613
<b>Full Name</b>	Gabrielle Richards
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>1 I'm in Kings Langley because of the farms - esp Wayside. I walk through twice a week - its opposite my house</p>

	<p>2 I'm in Kings Langley because its in the green belt and I value having nature around me, I need the green vegetation for my health</p> <p>3 I'm in Kings Langley because its a smallish community - a village - and I enjoy the intimate connections of village life, my small high street where people know each other + stop for a chat and a cuppa</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16614
<b>Full Name</b>	Mrs J. Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Our beautiful village will be spoilt from any more traffic. There are not enough parking spaces now.</p> <p>The words said in the Budget by Philip Hammond "continuing the strong protection of our Green Belt".</p> <p>The A41 is sometimes at a standstill now. Please - no more traffic here.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16616
<b>Full Name</b>	Bingwa Njoke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>This is an important part of the area.</p> <p>A wonderful farm with lifetime tenancy provider of milk, food and necessary for the area.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16617
<b>Full Name</b>	P.A. Fulton
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It is an historic village! "The jewel in the crown of Dacorum"</p> <p>Plans to develop on the green belt would totally destroy the character and status of the village, it would become another 'urban sprawl'.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16618
<b>Full Name</b>	Aysha Saifullah
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I don't think we need urbanise and destroy all of the green spaces in the UK. Another thing is that raw milk is becoming more and more popular in the market and Wayside Farm is the only farm local to me, and hundreds more to access the amazing raw milk!</p> <p>I urge you to take note of the issues raised above and reject the proposed development on the Green Belt in around Kings Langley.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16619
<b>Full Name</b>	Mr Derek Collins
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p>



	<p>Kings Langley is a unique village with ancient historical connections and any development of the Green Belt will overpopulate the village and it will lose its village status</p> <p>Moreover the infrastructure esp the A4521 is at bursting point and comes to a virtual halt at times.</p> <p>Not long ago we won Village of the Year West - keep our village a village</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16620
<b>Full Name</b>	Christine Dalziel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Apart from the gradual loss of village identity speeding up (started some 20 years ago), I disagree with the proposed development on 2 further counts.</p> <ol style="list-style-type: none"> <li>1 The traffic in the village has increased over the last 10-15 years sheer weight and indiscriminate parking causes jams, delays, frustration, damage to property and road rage. The additional homes will bring more cars and exacerbate the problem.</li> <li>2 The increased pressure on secondary school places would mean increased pupil numbers at Kings Langley school. Having worked at a large north London Academy for 37 years we campaigned successfully to bring the pupil count down. The senior leadership team and governors identified the considerable pupil body size as having a negative impact on pupils and staff alike, both from an academic and well being point of view. Kings Langley simply cannot sustain a village status with the proposed number of additional homes.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16621
<b>Full Name</b>	Rosemary Moore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 The designation of Wayside Farm is completely wrong! Charlie Wray's farm provides an <u>excellent</u> service to our community. He has one of only two Jersey herds in the country. This is his livelihood!! Building on that area is inappropriate (more offices are not required in the village) it would bring too much traffic to that area. The road cannot cope. It is already congested at peak times.</li> <li>2 The development of the other areas would be problematic, because of road congestion and considerable pollution.</li> <li>3 If there were to be a road connection from the Shendish area to the A41 bypass that <u>might</u> possibly be the lesser of all the evils.</li> </ol> <p>Any development will increase congestion, which is already dire, and pollution which will affect the health and well-being of everyone in the area.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16622
<b>Full Name</b>	Mrs J. A. Hopcroft
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>with the prospect of all the houses being built in and around the area, Kings Langley may well lose its village atmosphere. The High Street will be even more congested meaning more pollution and with presumably more families what about schools, doctors, etc, nearest Hospital, Watford already overstretched.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16623
<b>Full Name</b>	Mr Colin Fleming
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p>

	<p>It will be devastating for various reasons:</p> <ol style="list-style-type: none"> <li>1 Drainage - new houses, roads and concrete causes water to become a big problems - flooding</li> <li>2 Land - without this agricultural projects would be non-existent thereby causing hunger in the UK</li> <li>3 Milk production - with Brexit on the horizon. Thousands of litres would be stopped entering the UK, causing a huge milk shortage</li> <li>4 School children - would lose their connection with nature and where products originate from e.g. eggs comes from a supermarket</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16624
<b>Full Name</b>	Mrs Pamela Montague-Sutton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It will cause more congestion on the High Street. Not enough shops of the right kind. Bakers, etc.</p> <p>The doctors survey won't be able to cope with so many extra people, its stretched now and there is a long wait to see a doctor.</p> <p>It will loose its village feel.</p> <p>Its an awful waste pulling down houses to build flats doesn't make sense.</p> <p>Parking will be another problem.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16625
<b>Full Name</b>	Mr Ian McHale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The character of the village needs to be preserved.</p> <p>The proposed developments will lead to villages merging together as one.</p>

	Traffic is already at a standstill and developments will make this worse.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16626
<b>Full Name</b>	Mr Keith Sheffield
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I fully support Kings Langley Parish Council position - of adopting option 1A of the Dacorum Local Plan.</p> <p>I feel added housing in the Green Belt land in or around Kings Langley is unsustainable and would lead to further development and a gradual coalescing with Hemel Hempstead and Watford.</p> <p>The whole character of the village and the community spirit would be lost.</p> <p>Also local roads already congested at peak times would be further overloaded with added traffic with added pollution.</p> <p>Local schools and doctors surgeries are already overloaded.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16628
<b>Full Name</b>	Mrs Maria McHale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 I passionately believe that the rural character of Kings Langley village needs to be preserved. The massive proposed developments would lead to Kings Langley merging with Apsley and Hemel Hempstead, and Kings Langley would no longer be a village, losing its character forever.</li> <li>2 The proposed developments at Wayside farm, Rectory Farm, Shendish and Hill Farm would significantly increase traffic flow through Kings</li> </ol>

	<p>Langley village, especially near the M25 junction which is already very congested. We do not have the infrastructure to cope, and this would have a detrimental effect on air quality</p> <p>3 Not enough consideration has been given to protecting and preserving Green Belt open spaces promoting health and minimising pollution. More effort needs to be made to utilise existing brownfield sites and unused office space rather than developing Green Belt land.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16630
<b>Full Name</b>	Ilene McGregor
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I support Kings Langley Parish Council in choosing Options 1A as the preferred way forward for the Dacorum Local Plan.</p> <p>Further development in and around the village would lead to extreme traffic congestion and our pollution on the already overloaded road between Apsley, Nash Mills and the M25 roundabout.</p> <p>The village would gradually become a part of Hemel Hempstead. It would also put additional pressure on local schools and services.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16632
<b>Full Name</b>	Caroline McHale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>In your Core Strategy stated objectives you state you wish to promote healthy and sustainable communities, and to conserve and enhance the function and character of the villages and countryside.</p>

	<p>At present Kings Langley is a rural village surrounded by Green Belt beautiful countryside and has one of the four remaining Dairy Farms in Herts. However, the proposed substantial developments would endanger the very character of the village, which would merge with Hemel Hempstead and Wayside Farm along with other precious Green Belt land would be lost forever.</p> <p>Furthermore, the increased traffic the development would generate is not sustainable, as there is already high traffic flow through the village and surrounding area especially near the M25 junction.</p> <p>I am very concerned about the loss of green belt land, loss of the village character, increases in traffic and resulting pollution.</p> <p>I want to preserve Kings Langley and the surrounding countryside for my generation and future generations.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16633
<b>Full Name</b>	Elaine Parron
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I <u>object</u> to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Why do this when the traffic so bad here already what about Hospital, Doctor's, Schools it bad - enough now.</p> <p>Trying to get children into School, Dentist, Doctors, please think how this will affect our lovely village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16634
<b>Full Name</b>	Peter and Gill McDonnell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Public transport system (bus + rail) is inadequate now, let alone future needs.</li> <li>2 We have already lost 350 beds in this area and 2 A+E departments have closed.</li> </ol>

	3 The Nap Surgery has increased its patients from 6,000 to approx 16,000 - due to the already high density sites in this area
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16635
<b>Full Name</b>	Mrs Janet Judd
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Its becoming increasingly difficult to come out of Rucklers Lane with the Hempstead Road at the Red Lion traffic lights which would be made worse by the Shendish development.</p> <p>The road through the village is very congested all week now as its a busy village and so it would be a <u>very</u> big problem for increased housing to push the volume of traffic up especially in the emergencies for ambulances to get to Watford Hospital.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16636
<b>Full Name</b>	J. Ritchie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>mainly because it will create difficulties with overcrowded roads, schools and doctors surgeries.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16637
<b>Full Name</b>	Diana Camden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 The character of the village would be destroyed</li> <li>2 The roads are already too busy with traffic</li> <li>3 The London train commuters are already filled to capacity</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16638
<b>Full Name</b>	Marguerite Selby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ul style="list-style-type: none"> <li>• There will be loss of valuable farm land - we need space to grow more food as population grows</li> <li>• Kings Langley should remain a village not be merged with Watford and Hemel Hempstead</li> <li>• Our roads are extremely busy now, any new houses will make the situation much worse. Kings Langley has had much building in gardens over the years.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16640
<b>Full Name</b>	Valerie Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 The beauty of the natural country landscape of our village will be lost. The huge number of homes will change the spirit of the village community into a town, becoming part of an enlarged Hemel</li> <li>2 The High Street could not cope with extra traffic as it is already so busy</li> </ol>



	3 New schools and doctor surgeries would have to be built
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16641
<b>Full Name</b>	W. Ritchie
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>it will no longer be a village but a town because of the extra schools and doctors surgeries needed.</p> <p>It is difficult to park now with the traffic we have it will surely be impossible with all the extra traffic this development would incur.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16642
<b>Full Name</b>	Mrs Susan Bishop
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I would like Kings Langley to remain a village - not a busy town.</p> <p>There is not enough doctors, schools or roads to take this proposed development.</p> <p>I want the brownfield sites to be built on, there is <u>no need whatsoever</u> to build on green belt!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16644
<b>Full Name</b>	Mr Andrew Selby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on Green Belt in around Kings Langley because:</p> <ol style="list-style-type: none"> <li>1 Loss of farmland/greenbelt</li> <li>2 Merging of Kings Langley village into Hemel Hempstead/ Apsley</li> <li>3 Significant increased demand on local services + infrastructure (doctors, dentists, schools, etc)</li> <li>4 Increased local traffic</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16645
<b>Full Name</b>	Mr G. Parsons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>Because the community will lose areas of outstanding natural beauty.</p> <p>Rectory Farm is classed as an area of outstanding natural beauty, specially where the land meets the canal/river Gade.</p> <p>This green belt strip of land is all that stops coalescence with Hemel Hempstead.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16646
<b>Full Name</b>	Mr Colin Riddle
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It would change the whole atmosphere of the village and turn it into yet another urban sprawl.</p> <p>The village already has a parking and traffic problem and this development would only add to it.</p>

	The village does not have the infrastructure to cope with an increase of housing. We should maintain the Green Belt at all costs!!!
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16648
<b>Full Name</b>	Miss Giulietta Cinque
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: Once it is gone, its gone forever. We are lucky to have a farm, green rolling hills in and around Kings Langley. We would lose flora and fauna. We would lose the fresh air and walks. Concreting over would prevent rain soaking into the ground causing flooding. We would be denying future generations what we are lucky to have. It would cause intolerable extra traffic, pollution, noise, additional over subscription to schools and the train service. It's a criminal act.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16649
<b>Full Name</b>	Mary Bamford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ol style="list-style-type: none"> <li>1 Surgery appointments are already currently difficult to obtain and will already worsen with more residential homes coming increasing the density of the elderly population.</li> <li>2 Wayside Farm provides a break between Kings Langley and Watford. To add more traffic near the pinch point with the M25 would be a disaster.</li> </ol>

	3 Traffic from a Rectory Farm development would add to problems at the other end of the High Street.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16650
<b>Full Name</b>	Mr and Mrs Parsons
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: This special land is all that stops Kings Langley becoming an urban suburb of Hemel Hempstead. This green space is important, do not destroy it by building houses on it.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16651
<b>Full Name</b>	Carol Blunden
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: The proposed 4 sites would not enhance but debilitate the quality of life in this area - we could not sustain such huge growth with its proposed infrastructure - effect on woodland, wildlife or people would be devastating or destructive.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16652
<b>Full Name</b>	R. Graham Prentice
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  The 'Government and planners' are showing their usual shortsighted /witlessness by considering building on land needed for farming - to feed future generations.  Adding to the swelling 'London Courbation' is idiotic - londong (Area) doesn't work now - build somewhere else - away from here - e.g. Scotland - the North, etc - anywhere !
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16653
<b>Full Name</b>	Sue and Jorge Mendez
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  We would like Kings Langley to remain a village with all of its green belt land
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16654
<b>Full Name</b>	K. Mitchell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because:  1 It will further aggravate the already difficult traffic conditions in the area 2 There is no adequate infrastructure now i.e. schools, surgery and more development will only exaggerate this 3 There will be no benefit to existing residents ehatsoever
<b>Include files</b>	
<b>Number</b>	Question 46

<b>ID</b>	LPIO16655
<b>Full Name</b>	Bridget Burke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>I believe that the Council should explore the development of brownfield sites first as per Government policy or choose Option 1A to minimise building on Green Belt.</p> <p>Kings Langley (and Shendish) do not have the infrastructure (e.g. not enough parking and already busy traffic on roads and high street), to accommodate more houses/residents.</p> <p>Also rural nature of village should be preserved.</p> <p>Thank you.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16658
<b>Full Name</b>	Mrs Alexandra Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>The Green Belt is there to absorb the pollution from the M25 and surrounding roads.</p> <p>It also supports our local wildlife.</p> <p>Wayside Farm is one of two remaining dairy farms in the Country. I think the only Option is 1A but Shendish Manor should come under Kings Langley not Hemel.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16660
<b>Full Name</b>	Michael Bamford
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <ul style="list-style-type: none"> <li>1 The plan embodies ribbon development joining Watford to Hemel Hempstead and destroying the village atmosphere of Kings Langley (52 year resident)</li> <li>2 The roads through the village are already blocked for much of the day</li> <li>3 The newly rebuilt Kings Langley school has had to reduce its catchment area every year.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16661
<b>Full Name</b>	Mr Kevin Bishop
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <p>Option 1A - Shendish Manor should come under Kings Langley</p> <p>Wayside Farm is only one of two remaining farms of its kind in the country.</p> <p>Green Belt is there to protect wildlife and absorb pollution from the M25.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16663
<b>Full Name</b>	Sheila Kellaway
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I object to the proposed development on the Green Belt in around Kings Langley because: <p>Kings Langley already has a traffic + parking problem.</p> <p>This development would mean even more traffic would need to use + park in the village.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO16664
<b>Full Name</b>	Mr Martin Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p> <p>It will ruin the character of the village, it will decrease the habitat for local wildlife, increase traffic problem (which are already bad) and increase pollution.</p> <p>There is not the infrastructure or parking to cope with more development.</p> <p>Brownfield sites should be developed first.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16666
<b>Full Name</b>	F M King
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the proposed development on the Green Belt in around Kings Langley because:</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16705
<b>Full Name</b>	Katie Parsons
<b>Company / Organisation</b>	Historic England
<b>Position</b>	Historic Environment Planning Advisor
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Issues and Options consultation document references the Council's Schedule of Site Appraisals which sets out the initial appraisal of a number of larger potential site allocations. At this stage no recommendations are made with regards to what sites are to be taken forward or not. The Call for Sites process</p>



is underway so it is anticipated that the Schedule of Sites Appraisal will be updated to include sites emerging from this process. Given this, it is not practicable for Historic England to comment on every site being considered. It is expected that sites which are to be carried forward have been identified taking into account the need to conserve and enhance the historic environment using our general guidance (see below). We are pleased to see that the site appraisal pro-forma includes identification of heritage assets as well as an element of evaluation. The approach adopted at this early stage demonstrates that the historic environment forms an integral part of the site identification process which is very much welcomed. The schedule itself, once revised to include all sites to be carried forward, will be a very useful tool in the local plan process. The information is presented well and the map in Appendix 4 is particularly helpful so we would encourage a similar map to be provided in the next draft of the Schedule.

#### General principles

It is expected that heritage assets, designated and non-designated and their settings, will be identified and mentioned explicitly within any site specific policies and within the supporting text, alongside any mitigation measures necessary for all site allocations. In order to make the plan sound, the vision and key development principles for site allocations and associated site specific policies should refer to the need to protect the significance and setting identified heritage assets both designated and non-designated.

We would expect visual and physical separation to be retained between settlements and this will need to be a critical aspect of any masterplanning for large scale urban extensions and site allocations. The cumulative impacts of development upon the historic environment should also be considered to ensure that open spaces are not eroded to the point where they no longer have any value.

New development needs to be appropriate in terms of topography and visual impact and so issues such as building heights should be acknowledged as a masterplanning criterion and acknowledged in any site specific policies and supporting text.

In general terms we would favour options that maximise urban capacity. However, site allocation and growth options in or around existing settlements should be developed on the basis of a thorough understanding of the character and attributes of the urban areas, including the historic environment, to ensure development that both edge of settlement and infill development respects and enhances existing qualities.

Some of the sites which may be allocated would result in substantial urban extension to existing settlements. It is likely that such large site allocations will need to be supported by a Heritage Impact Assessment (HIA) for example. Site HH-h1a at North Hemel Hempstead would immediately abut the small settlement of Piccotts End, which contains a conservation area, Gadebridge Roman villa a scheduled monument, the Grade I listed 130-136 Piccotts End, Grade II\* listed Little Marchmont House,

and a high concentration of Grade II listed buildings. There is concern that the site allocation would result in coalescence between Piccotts End and the larger conurbation of Hemel Hempstead. The SA site appraisal correctly identifies the main heritage assets but concludes that the effects of new development in this location would be uncertain. An HIA would be especially helpful in this case, and should be provided if this site is to be carried through into the Local Plan as an allocation, this will be the case for most large allocations.

Archaeological impacts will also need to be carefully considered and referenced in any site specific policies. For example, there is some concern regarding site HH-h3 – Land at Shendish Road Hemel Hempstead. The SA site appraisal states that the County archaeologist has been consulted which we are pleased to see. However, the County archaeologist has identified there to be a high risk that heritage assets with archaeological interest are present on the site. The SA then identifies that an archaeological assessment would therefore be required before submission of a planning application. Whilst this is supported it is not considered that this alone will be sufficient protection for the potential heritage within the site. The mitigation will need to be more specific and outline an iterative approach will address what will happen should anything be discovered rather than simply requesting an archaeological assessment to be submitted.

#### Site Allocations

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. Conservation and archaeology staff within the relevant councils should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.

We often find that while some of the sites in the Plan identify heritage assets as potential constraints, this is not consistently done for all sites and all heritage assets. There also can be limited information in documents on how sites might be developed, making it difficult for Historic England, and others, to assess their full impact. We are keen that allocated sites include development criteria to guide future proposals, including references to the historic environment where needed (this follows the national Planning Practice Guidance). There is a danger to both heritage assets and potential developers of allocating sites without such criteria and establishing the principle of development without guidance on the issues that need to be addressed at the planning application stage. The significance of heritage assets, and the potential impact of allocations on that significance, will need to be understood and justified.

It should be noted that there are areas of archaeological interest beyond scheduled monuments and historic landscape issues beyond registered historic parks & gardens. Wider archaeological and landscape/townscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.

All sites should be scoped for archaeological potential before taking them forward to the next stage, as there is a high likelihood of archaeological sites not on the HER.

Archaeological assessment and evaluation should be in line with the NPPF and best practice guidance so that impacts can be assessed at the earliest opportunity.

#### Assessing sites

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

In essence, it is important that you

- 1 Identify any heritage assets that may be affected by the potential site allocation.
- 2 Understand what contribution the site makes to the significance of the asset
- 3 Identify what impact the allocation might have on that significance
- 4 Consider maximising enhancements and avoiding harm
- 5 Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question.

Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)” (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear

	<p>indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).</p> <p><u>Assessment criteria</u></p> <p>Many authorities include a distance based criteria to assess impact on the historic environment. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16739
<b>Full Name</b>	Martin Ephgrave
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>The proposed housing site to the west of Hoo House, Little Gaddesden is in a sustainable location in the Rural Area. It is on the edge of the existing built up area and is within walking distance of the services that exist within this thriving rural settlement. Little Gaddesden has 6 key services, including a Primary School, Post Office, Community Centre/Village Hall, Food Shop, Pub/restaurant and Play area and sports pitches</li> </ul> <p>The site has a capacity to provide up to 10 new homes, including affordable housing, and this would provide a significant contribution to the housing needs of this rural community.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16758
<b>Full Name</b>	Martin Ephgrave
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We do not wish to comment on the draft Schedule of Site Appraisals. However, as stated above, we are concerned that the Council is not proposing to allocate enough housing to the 'Rest of the Borough'. The Council is also seek to deliver new housing through the allocation of a limited number of very large sites, and the Sustainability Appraisal completely ignore the many smaller sites that have been put forward for development across the Borough. It is considered that small sites can provide for future housing growth in a much more organic way, and are often the best way of delivering new housing, particularly in smaller settlements such as Little Gaddesden.</p> <p>Dacorum Borough Council is carrying out a Call for Sites, so that potential allocations can be considered through other technical work and incorporated into the emerging Local Plan.</p> <p>We wish to make a formal site suggestion in respect of the Land to the west of Hoo House, Little Gaddesden HP4 1PE. The site is capable of delivering 10 or more homes and extends to some extends to approximately 1.69 hectares (exceeding Call for Sites 0.3ha site size threshold).</p> <p>Please refer to the separate Call for Sites Report attached at <b>APPENDIX 1</b>. see ATTACHED</p>
<b>Include files</b>	<a href="#">James Holmes Mr Martin Ephgrave - Appendix 1 - Call for Sites Statement (8 Dec 2017).pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16759
<b>Full Name</b>	Linda and Michael Legge
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We would like to register our objections to the proposed over development planned for Berkhamsted.</p> <p>We have lived in Berkhamsted for 38 years and over that time we have seen a vast increase in the traffic congestion around the town. Commuter parking in all the side roads leading to the high street make the roads difficult to negotiate. Parking around all the schools in Berkhamsted in horrendous. Parking in the car parks in Berkhamsted is a nightmare. The Bearrock park development has increased the volume of traffic along Shootersway and the roundabout at King Road and this will increase further once the second phase of the</p>

	<p>development is completed. The road infrastructure is not capable of coping with the volume of traffic at the moment any major increase in development will exacerbate these problems.</p> <p>We have heard all the platitudes about having increased bus services and encouraging people to walk. Residents, especially the elderly and people with young children will not walk up the hills from the high street and station. The cost of the station car park on top of rail fares mean commuters will park for free in all available access roads.</p> <p>Berkhamsted is a picturesque town surrounded by green belt. This green belt has been continually eroded over the years and any further large development will only mean this green belt will disappear and Berkhamsted will merge into the surrounding urban areas.</p> <p>We feel Berkhamsted has had more than it's fair share of development and it's time Hemel Hempstead, which is a town that is badly in need of regeneration, should be further developed with family housing!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16761
<b>Full Name</b>	Chris Graham
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>TRING</p> <p>&gt; I understand that we do have to build more housing and like to feel we can support the young from Tring by supplying affordable housing, but the proposal to build a total of over 2,500 houses on greenbelt land is a travesty. Tring is a small market town with a centre, surrounded by housing, business and recreation. It thrives on community spirit, which is built on the fact that Tring has a town centre, with schools, doctors, shops, and all amenities within walking distance. The Dacorum site comments on the fact that these are Tring's core strengths and is the reason it still exists.</p> <p>&gt; I object strongly to the use of green belt for housing. I also object to Tring becoming a sprawl of additional housing estates that will be marginalised by their position and access to the town centre thereby ruining the community of Tring.</p> <p>&gt; I object to the possibility of an increase of the Tring population by 80 percent, this being if all houses were built and ended up with an occupancy of 4 per house (quite possible if built for young families to afford). Even with only 2 per house this is a 40 percent increase. Tring is already oversubscribed to schools, doctors and other social services and car parks are regularly full. We already have a large amount of 'stealth' building around</p>

the town with more quietly planned. Any large increase in housing and population would have a huge impact on all aspects of life here but specifically:

- > Schools, junior schools mostly full and no possibility to extend the current secondary school. Also lack of sports and other facilities if this were to somehow happen.
- > Doctors, Try and get an appointment within a week a lot of the time . We use an Aston Clinton doctor and it is the same story.
- > Car Parks. Already full to bursting most of the time. Management, or in layman's terms, stopping the locals using them as much as possible, stops people shopping etc.
- > Roads . Tring High Street is regularly grid-locked now by any delivery van, funeral car or street cleaner and when another section of the road collapses. A regular occurrence.
- > Buses. They don't provide the services that are required and can never do so. Integrated transport only works in cities and not in semi-rural areas when people are living in spread out communities.
- > Trains and the parking there. Commuter trains are already packed, parking is already beyond capacity and even Sunday and late night trains are regularly standing room only now.
- > A41 bypass, this is the main access road to London, Watford and Aylesbury but was downgraded from motorway status and therefore not having suitable slip roads now and no hard shoulder. It sucks in traffic from all the surrounding areas and is regularly blocked at either end for half a mile or so. When there is an accident the old main road is completely gridlocked for hours.
- > Hospitals. The brave New Town Hemel Hempstead hospital serving the massive post war settlement and surrounding areas is Closed! St.Pauls maternity hospital is Closed. Royal Bucks is Closed. Watford General is Closed. We have Stoke Mandeville to cope with Aylesbury and half of Bucks. and Watford Hospital, which is all but unreachable some days because of its location, to deal with half of Herts.
- > Road maintenance, our high street is permanently collapsing. Not one single road has a decent serviceable surface and the A41 bypass has the noisiest surface imaginable at the Berkhamsted and Tring end so it blights the towns with constant traffic noise.
- > Police, No particularly visible police presence, certainly no police station.
- > Ambulance . See hospitals . Is a six hour wait considered reasonable for non deadly cases?
- > Water Supply and drains. Generally Victorian and just added to willy-nilly. Not fit for purpose now!
- > etc
- > etc
- > At least in Hemel Hempstead there is capacity, an integrated transport system, easier access to motorways and the possibility of re-opening the hospital

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16763
<b>Full Name</b>	Holly Higby
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am extremely concerned like most residents in tring about the amount of houses going to be built in tring and the effect it will have on Tring. As your plan states up to 2430 homes to be built</p> <p>I have no problem with the areas you have picked as they are just green land it's a shame to get rid of all the green land in tring as some residents go for walks walk their dogs ECT.</p> <p>Tring has always been a small town so it will have a big effect on tring I am concerned with the following:</p> <p>The only secondary school is Tring school &amp; Primary schools it will have an effect on the amount of students and whether they can accommodate.</p> <ul style="list-style-type: none"> <li>• Tring Surgery is extremely difficult to even get a appointment so you would have to build another surgery for that kind of capacity.</li> <li>• Only supermarket is Tesco will you be expanding it.</li> <li>• Will the homes be council homes or for people to buy as for young people like myself are trying to save up a deposit and buy a home.</li> <li>• The Quality of the roads are poor epically tring high street if you do intend to build this is going to have a bigger effect.</li> <li>• There has been a plan to get rid of Petrol station so will you be building another one as if you are making tring bigger you need to think about this.</li> <li>• Parking is silly tring this needs investigating</li> <li>• Jobs what opportunities will it bring?</li> </ul> <p>I feel no matter what people say the Government/ Council will go ahead with a plan to build a huge amount of houses in tring but what can they promise the residents of tring who have lived here for decades, we understand people are living older and we need more houses. But we are talking a huge reconstruction of tring. This needs to be thought about and planned carefully I have seen the pictures of what before and after it may look like I hope more roads and access ways are put in.</p> <p>When will the building of the houses start and when will the people of Tring Know defiantly what the plan is and how many houses will be built.</p>
<b>Include files</b>	
<b>Number</b>	Question 46



<b>ID</b>	LPIO16766
<b>Full Name</b>	Mrs June Gossling
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am opposed to the proposal to build 360 additional homes in the Bovingdon area in the latest plan.</p> <p>My greatest concern is that the infrastructure is already overstretched, particularly regarding congestion on our roads. The volume of traffic in the village has grown significantly in recent years leading to constant delays in the High Street and insufficient parking places. This is compounded by the number of HGV delivery vehicles and large agricultural machinery that pass through. You will also be aware that Bovingdon Market accentuates local traffic congestion on a Saturday when it can take 30 minutes to drive from the village down to Hemel. Furthermore your proposals for two sites accessed via Louise Walk and Homefield will worsen the access and egress to and from Green Lane/Bovingdon High Street.</p> <p>Secondly the volume of traffic will inevitably have a negative impact on air quality which will only get worse with additional road users.</p> <p>Thirdly parts of the village are prone to flooding particularly around Rymill Close and more development will increase surface run off. The drainage/sewerage system failed to cope last year and some families had to move out until their homes were made habitable again.</p> <p>I am against taking more sites out of the green belt which should be left to safeguard the countryside.</p> <p>For these and other reasons such as a shortage of school places and medical facilities that will become overstretched, I consider that the allocation should be ruled out or greatly reduced.</p> <p>I have lived in other places which did not offer the good quality of life I have come to appreciate in Bovingdon and I fear that allowing development to proceed on the proposed scale will destroy a vibrant and cohesive community</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16767

<b>Full Name</b>	Keith Wright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>In response to the consultation on the above plan as a resident of Bovingdon I comment as below</p> <p>1) I accept that some development does need to progress but consider the plan to allow 90 new homes as in the existing plan is as much as the village can support.</p> <p>2) The village is under pressure with regard to vehicle capacity in and around the High Street and current developments will increase this if we assume 2 cars per new home.</p> <p>3) The school is virtually at capacity with no room to expand as are local Doctors and Dental Services.</p> <p>4) Loss of Green Belt, impact on sewers and increased risk of flooding within the village will all adversely impact the environment.</p> <p>5) My preferred option therefore is Option 2B</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16769
<b>Full Name</b>	Jennie Broome
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I'm sending this email as I would like you to hear my opinion on the proposed housing developments in Bovingdon.</p> <p>As someone who was born and bred in Bovingdon, i think it's fair to say that I love where I live. Bovingdon has been my families home for generations and it's where I will probably spend the rest of my life. I love the people, the friendly nature you get when walking round the village, the landscape, the country walks and the close nit community I've always known.</p> <p>I feel the proposed housing developments will blight the village in that we have issues with parking in the village high street and surrounding areas, our doctors surgeries will be under more pressure as well as the one primary school.</p>

	<p>There's also the issue of Green Belt. Green Belt policy was established in 1955 primarily to stop urban sprawl.</p> <p>I feel 'urban sprawl' will ruin this village. We want to remain a village, NOT a town!</p> <p>Conservative Manifesto stated clearly that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. In March this year, the Prime Minister declared that protecting the Green Belt is 'paramount'.</p> <p>The benefits of Green Belt remain as vital as ever. By looking at other countries we can see that without the strong protection it offers against most forms of development, more valuable countryside would be consumed by urban sprawl – and the character of our villages would be irreversibly eroded.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16771
<b>Full Name</b>	Vaughan Rance
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in reference to the proposed Dacorum Local Plan for housing.</p> <p>Firstly, I totally accept that there is a need and an obligation placed upon us all to provide affordable housing for future generations in all areas.</p> <p>I also accept that your inbox may be littered with emails that all effectively say.. "not in my town"</p> <p>However, I would like to give you the <b>current</b> "day in the life" of a Berkhamsted resident.</p> <p><b>PARKING</b></p> <p>Nowhere. At Tesco, Waitrose, St Johns (behind the Tennis Club)</p> <p><b>SCHOOLS</b></p> <p>Overcrowded. Oversubscribed. No space</p> <p><b>DOCTORS</b> (Milton House)</p> <p>Cannot get appointments.. on phone.. on line... even queueing outside at 8am as the surgery opens</p> <p><b>EXITING IN CAR</b></p> <p>A41 tailbacks as of 7.10am every weekday morning</p> <p><b>TRAINS</b></p> <p>Can't get a seat unless you get a train before 7am in the morning</p>

	<p>The town is becoming impossible as is and I understand Berkhamsted has had 628 houses built recently.</p> <p><b>SCENARIO</b></p> <p>Is the driver behind (even the suggestion) of further properties in Berkhamsted this?</p> <p>Given that the properties are generally worth more.. is it ONLY Berkhamsted that property developers are interested in to build houses?</p> <p><i>Q: If as a scenario a builder can build a house for 10p anywhere... but sell it for 15p in some places and 20p in another... it becomes quite obvious where they are prepared to build.</i></p> <p>Equally... as a council, no doubt you have obligations to fulfill new build quotas. If the builders won't build where there's space... only where they get the inflated returns they demand.. it has to be YOURSELVES who have the <b>vision and responsibility</b> for the carnage they leave when they are paid .. and gone.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16772
<b>Full Name</b>	Marc and Fiona Groves-Raines
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Since moving to Kings Langley in 2003, we have noticed how the village has continued to attract new residents leading to an already stretched transport system. The train service is inadequate and there are increasing traffic problems in simply leaving the village at or around rush hour. Whilst we understand that these sorts of issues can be addressed by additional investment in local infrastructure, this will undoubtedly require additional use of conservation and green belt areas and substantial disruption to local residents for many years. The character of Kings Langley as a village is unique within this distance from the M25 and should be preserved in order to ensure a balance in the landscape and community structure. There are other examples of course, however in developing a plan for the future special care should be taken not to take decisions which will ultimately detract from this special character. The danger is that the urban sprawl will begin in London and stretch all the way, uninterrupted to Hemel Hempstead.</p> <p>Rather, effort should be directed towards investing in the development of areas, such as Hemel Hempstead, which offer employment potential and good transports</p>

	<p>links, both rail, car and lorry. The benefit of this is to develop an economically thriving community of the future where people are again able to work close to where they live, with its associated environment and societal benefits. This thinking should be at the heart of any Strategic Plan looking towards 2036, when environmental issues will once again have to be at the heart of how we go about our lives. This is true for the planet as well as the population's wellbeing.</p> <p>The character of Kings Langley would be ruined by the development of any of the proposed sites in the parish included in the strategic plan. Aside from this, the suggestion that there is 'level access' to the village from any of the sites is simply wrong; anyone who has visited the village will be able to confirm that, for example, walking from Hill Farm to the village and back requires ascending a steep hill, which is a challenge for less active individuals.</p> <p>We therefore strongly urge you to consider carefully the choices for Dacorum as a whole. This will require a vision for a world of the future which is sensitive to environmental needs and the wellbeing of residents. The residential plan should be combined with a bold industrial plan structured in order to minimise distance from work and schools. Be brave!</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16773
<b>Full Name</b>	Mr Kenneth R Jeffreys
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to express my opposition to the plans proposed that will turn Kings Langley from a successful rural village into an annex of the nearby towns of Hemel Hempstead and Watford.</p> <p>The proposal totally ignores the tremendous increase in road traffic which would occur with the development of the suggested surrounding Green Belt sites.</p> <p>The A41 bypass was built to avoid the destruction of the Village by excessive through traffic.</p> <p>These latest proposals would cause the destruction of the Village and its rural character from within.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO16774
<b>Full Name</b>	Robert Allnutt
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The current plan takes no account of the amount of development that has occurred in recent years and the proposal to add any of the new sites proposed for development under the proposed plan is unacceptable.</p> <p>If you live here on a day to day basis you will know that already traffic queuing to get into Berkhamsted from the A41 bypass stretches back onto the bypass itself. The addition of the traffic lights at the Shootersway junction has added to this significant congestion. This can only get worse when the second phase of the Durrants Lane site development adds more traffic to this situation. (The potential idea of adding Haslams field as a further development site will make this traffic load impossible).</p> <p>I also object to the lack of planning control in ensuring that any developments if approved should offer a significant level of avoidable housing. We do not need more executive houses in Berkhamsted but a reasonable provision for units which younger people or those on modest incomes can afford. The flats at the centre of Berkhamsted where the new library is sited are not affordable in that sense and the recent Durrants Lane / Shootersway site as far as I know consists of executive housing.</p> <p>There is never any commensurate increase in our schools or doctors surgeries (where getting an appointment within a week or two is often impossible). Car parking in Berkhamsted is very difficult. You need real local knowledge to find a free car parking space after 9am in the week or even to secure a space in the paying car parks and street parking spaces. You just cannot go on adding to the traffic by adding houses and cycling here is unrealistic given the steep hills of our valley).</p> <p>This is not surprising given the narrow constraints of the Berkhamsted valley and the lack of any big sites in that valley to convert to housing. It is simply unrealistic to continue to expect that space to provide the housing numbers current policy requires.</p> <p>I suggest a much more sensible approach is to look at the existing unused sites which we have. For example, the Roy Chapman garage site in Gossoms End in Berkhamsted should surely be used for residential housing and not for a new supermarket or further commercial use. The old Lucas site at Junction 8 Hemel Hempstead has remained derelict for too many years and has now become a rubbish dump. More brown field</p>

	<p>sites could be utilised in this way rather than ruining green field sites.</p> <p>We as Berkhamsted residents all feel that enough is enough. If current government policy dictates that we are to suffer this further unreasonable overloading, the response will ultimately come through the ballot box. Berkhamsted has certainly taken more than its share of development and many feel the town is not the place it once was. The preservation of our environment remains our number one priority and our local government representatives cannot expect future support if they do not in turn seek to protect our interests.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16780
<b>Full Name</b>	Gerard Sheldon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My concerns about Kings Langley are that some of the options in the consultation would mean:</p> <p>1) Kings Langley village would no longer be a village, with its distinctive experience for the people of the village. What is lacking in the consultation is any appreciation of what village life is like, and why it matters to residents of Kings Langley. In a village there is an opportunity to foster a closer community, and there is plenty of community energy to create the Kings Langley Carnival in the summer, and the Kings Langley Christmas Lights festival.</p> <p>2) The village would become a suburb of Hemel Hempstead or become joined up with Apsley. At the moment there is countryside separating Kings Langley from neighbouring villages and areas, something which helps define Kings Langley as a village. It also makes Kings Langley more beautiful.</p> <p>3) Much longer delays to get to hospitals, the nearest being Watford, and thereby threatening people's lives. How could one get to any hospital with so many cars on the road due to the new proposed developments. There would be more cars and traffic jams in Kings Langley, as it would not be possible to create new roads to support the proposed developments.</p> <p>4) As mentioned in the previous point, there would be increased traffic congestion, particularly as people may want to drive to Hemel or Watford to do shopping. .</p>

	<p>5) There would not be not enough doctors surgeries and schools.</p> <p>6) Wayside Farm would be lost, which is an important part of the character of the village. It is important for children to see a farm in operation as they walk past the farm, and anyone in the village and can pop in to the farm and buy milk.</p> <p>I chose to live in Kings Langley, because it is a village. Please let it remain a village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16781
<b>Full Name</b>	Gerard Sheldon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	6) Wayside Farm would be lost, which is an important part of the character of the village. It is important for children to see a farm in operation as they walk past the farm, and anyone in the village and can pop in to the farm and buy milk.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16783
<b>Full Name</b>	Emma Duke
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Q.46 Sites_Bovingdon</p> <p>As resident in Bovingdon it is clear to see the pressure that the village infrastructure is currently under, even without the proposed new builds. I expect that I will not be the first or last person to mention that the school is at capacity, as are the local doctors surgeries (one of which is connected to The Nap in Kings Langley and will certainly be impacted by the proposed development there).</p> <p>Traffic management in the village is already exceptionally poor with rush hour times being perilous. We have two</p>



	<p>young children which we walk to the village school each day and it is common to see cars mounting the pavement, or blocking the pavement (due to lack of parking) causing pedestrians into the street. This is compounded at the weekends when everyone is on the move. We in the village have been very vocal about this issue in the past to no avail. In fact someone mentioned to me that it would take a fatality to facilitate a change here and I think that sadly that may be true.</p> <p>Although I am very much against the proposed development in our village, I feel that if another option were to be selected then investment in infrastructure should be made BEFORE any build is undertaken thus showing a commitment to the residents.</p> <p>Aside from the community services and infrastructure which would be negatively impacted by the proposed build, I object on the basis that the development of Green Belt is in direct contradiction with Dacorum's Core Strategy. Bovingdon community values it's countryside surroundings. It is part of the identity of the village and I feel that preserving the Green Belt is of paramount importance to the village.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16785
<b>Full Name</b>	Katie Guest
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<ul style="list-style-type: none"> <li>• I have lived in Dacorum for the past 35 years, in Berkhamsted for 25, Tring for 1 and Northchurch for 9 - currently HP4 3RW. Also worked in Dacorum at Carestream (Park Lane, Hemel), previously Kodak for 35 years. So I know all the key Dacorum places in the plans very well</li> <li>• the Green Belt is a vital green space for the benefit of all local people's well-being and for the sake of wildlife</li> <li>• I am a passionate wildlife supporter - my garden backs onto Two Oaks Pony Sanctuary, and my garden is host to numerous birds (greenfinches, woodpeckers, jays, as well as the usual garden birds), all coming in to to feed, as well as the occasional muntjack, the whole ecosystem and habitats around us (there are not so many safe havens for wildlife left) are all at risk through harming the Green Belt</li> <li>• the geographical layout of Berkhamsted and Northchurch makes it very difficult to add in more housing, with all the strains on the 1 main road</li> </ul>

	<p>and all the side roads, traffic is clogged on Shootersway every morning and evening, and Darrs lane is a single track road, which can't take any more traffic and pollution is increasing rapidly</p> <ul style="list-style-type: none"> <li>• the GP surgeries are struggling already so how can our town take any more residents??</li> <li>• We have already had more than our fair share, compared to Hemel</li> <li>• there should be no building on green belt in Dacorum when other areas of the County are also expanding hugely</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16788
<b>Full Name</b>	Lucy Walton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object to the South Berkhamsted Concept.</p> <p>The infrastructure of the town cannot support such a huge increase in population the scale of the development is totally inappropriate.</p> <p>The increase in traffic and pollution would make me concerned about my children's safety walking to school. There is no provision for a middle or secondary school which would stretch the existing facilities. I am also against building on Green belt land and the loss of our beautiful countryside.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16790
<b>Full Name</b>	Ann Allison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Be-h3 Land at Ivy House Lane</p> <p>In answer to Question 46 of the Issues and option as Consultation Local Plan 2036 dated November 2017 I would like to express my objection to the above site being considered for inclusion in the Local Plan as it was</p>

	reviewed as recently as July 2013 and refused. There have been no significant changes since that date.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16792
<b>Full Name</b>	Ann Allison
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The proposed site clearly does not 'promote sustainable development' as stated as being 'very important' in your documentation for the reasons shown below;</p> <p>1 The roads around the site are inadequate, narrow and poor quality (uneven road surfaces, lack of pavements, limited visibility) to cope with an additional 150 houses with at least 2 cars per household of necessity by virtue of its location at the top of the Chilterns. Available public transport is practically non-existent. Ivy House Lane is itself a poorly maintained single track road with all access to the town involving crossing single lane bridges/tunnels over/under the West Coast Mainline and Grand Union Canal with width, height and weight restrictions.</p> <p>Gravel Path is a very steep and winding road with speed safety issues and does not easily allow two-way traffic particularly Waste Disposal trucks and white vans. Meadway is a narrow private road with both entrances hazardous as a result of limited visibility. Within 80 yards of the exit from Ivy House to The Common there is a tight crossroad on a sharp corner which also has limited visibility from Nettleden and there are speed concerns.</p> <p>2 Development of this site would only add to rail and car parking capacity issues which are acknowledged to be over their maximum during peak periods. Even with a new planned car park there is likely still insufficient space to meet the current car population before any more houses are built in Berkhamsted caused by overbuilding of non-affordable homes by developers. Approach roads from this site into town and around the station are a parking lot and are becoming unsafe – Station Road, George Street, Manor Street, Ellesmere Road, Ravens Lane, Castle Street, New Road to name a few.</p> <p>3 Unsustainable traffic flows already exist, specifically with traffic from Ivy House Lane to Waitrose unable to exit back onto Lower Kings Road but forced through the only exit in Waitrose car park and then detour back along the High Street added almost 1km to journeys and, creating congestion particularly at intersections. The addition of the planned car park at the side of Waitrose will only aggravate this situation.</p>

4 The site owners/promoters do not appear to be aware of the local topography or if so their offer of footpaths and cycle ways in an area where few exist for obvious reasons is cynical (cycling or walking up Ivy House Lane/Gravel Path carrying shopping or with children certainly put more costs onto the NHS!!!). The main site access on Ivy House Lane is restricted, as previously mentioned, to single file traffic and no comment is made to how this could be improved to allow two lane traffic movements into the town.

5 Berkhamsted medical facilities are stretched with patients in some practices unable to get appointments for several weeks. Emergency medical services involve an unacceptable 55 minute journey during peak periods to Watford or less to Stoke Mandeville or Luton. Allowing developments in locations where there is a significantly increased risk of treatment delays is discriminatory relative to other parts of the Borough and should not be knowingly ignored by Dacorum Planning. No improvements to access Watford Hospital can bring it physically nearer to Berkhamsted.

6 Affinity Water is straining/struggling to cope with current water supply in the area. Gravel Path and White Hill have been dug up at least 6 times in 2017 for leakages and planned repairs. This summer, water supply was cut-off several times to Hunters Park residents in the evenings without notice apparently due to low pressure. Sewerage is also an issue with the small main drain running through the site causing blockages, due to lack of capacity, and resulting in overflows into Hunters Park houses usually twice a year.

7 As a result of Berkhamsted building in excess of the planned rate included in the Core Strategy, and infrastructure lags houses buildings, the public and private secondary schools are now stretched beyond capacity. To consider continuing to build at this rate without giving the infrastructure time to catch-up will only limit future development as is happening today.

8 Finally the site is adjacent to the Chilterns Area of Outstanding Natural Beauty and forms the highest part of the landscape with unarguably one of the best views over the Chilterns. As well as destroying productive farmland, the rural character of Ivy House Lane, currently much enjoyed by residents and ramblers, would be spoiled particularly at night with new street lighting that would be required for any proposed development.

In summary and for the reasons stated above, this site should be rejected from further consideration.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16795
<b>Full Name</b>	C & J Fyfe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The proposed development of Site Be-h3, Land at Ivy House Lane, Berkhamsted is completely at odds with some key statements in Plan Vision document for the reasons described below.</p> <p><b>Access</b></p> <p>Access to the site can only be made from Ivy House Lane at the eastern side of the field. This is a narrow country lane with steep gradients to a dip in the middle of the site's eastern edge which floods frequently during wet weather due to surface water run-off. The lane remains narrow at the north end where it joins Berkhamsted common. The south end has a single lane bridge over the railway leading to Bank Mill Lane to the east and George Street to the west. There are no footpaths and the steep gradients and narrowness make it particularly unsuitable for cycling. Bank Mill Lane is normally restricted by parked vehicles and leads to a further single lane humped bridge with restricted vision over the canal immediately after a sharp right turn. About 50 meters after the bridge, the lane splits at T-junction, again with restricted vision, the eastern branch being very narrow, while the western branch eventually leads out to the A4251. George Street is reduced to a single lane at all times by cars parked on both sides due to the absence of off street parking. It in turn leads to a T-junction at Ravens Lane which, at that point is also normally reduced to a single width by parked vehicles on the west side, has a narrow bridge over the canal to the south and a single lane bridge to the north over the railway. In addition, other local congested and narrow roads, such as Gravel Path and Ellesmere Road would be significantly affected by this development.</p> <p>There is no useful bus service to any part of North Berkhamsted and all facilities, including medical services, shops and schools are situated to the south of the railway and canal, with all crossings from the north to the south being single lane, of which two have weight limits due to structural weakness and the others have significant height restrictions.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16797
<b>Full Name</b>	C & J Fyfe
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Environment</p> <p>As is recognised in the planning documents, the site is adjacent to the Chilterns Area of Outstanding Natural</p>

Beauty and any developments would detract from views over this area which can currently be enjoyed from several aspects, including the valley below.

Biodiversity is acknowledged as a potential problem with loss of habitat. The chief planner himself recently concluded that any development of this particular site would adversely affect the adjoining COANB.

This is contrary to the protection and enhancement of Dacorum's distinctive landscape, biological and geological diversity as described in the Plan vision document under the heading "Environment".

#### Other Key Points

- Dacorum's Core Strategy rejected this site because of its proximity to the Chilterns AONB, its impact on the valley sides and the important dry valley location and the fact that the strong countryside/Green Belt boundary would be breached.
- The Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified the area surrounding this site as characterised by low density detached housing. The proposed development is of a much higher density which would completely change the character of the Area. Again this is contrary to the protection and enhancement of Dacorum's character as described in the Plan vision document.
- Medical services in the town have been overstretched by the creeping development which has already taken place in recent years.
- There is a critical shortage of school places, again due to the development which has already taken place.
- Infrastructure in the area is inadequate for the existing load being placed on it with frequent sewage blockages and burst water mains.
- Surrounding roads are narrow, have a limited capacity, and are already congested. Even the A4251 is reduced to a crawl during the working day and much of the local traffic tries to use these narrow side roads, including Ivy House Lane, to avoid the congestion in the town centre.
- There is no plan to create additional jobs in the town. New residents would be forced to seek employment elsewhere, resulting in much higher than normal use of cars at peak times.
- The Church of St Michael and All Angels, located on the lower slope of Ivy House Lane is an active church with numerous community driven activities throughout the week resulting in significant street parking due to the very limited off-street parking available and the need for convenient access for the elderly and disabled.

**Include files**

**Number**

Question 46

<b>ID</b>	LPIO16806
<b>Full Name</b>	Jon G. Wright Dawn Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16853
<b>Full Name</b>	Jon G. Wright Dawn Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>With regard to the placement of any new development, site Tr-h5 seems most sensible due to it's proximity to the A4251 coming in to Tring, the adjacent Tesco, and the nearby developed areas. Tr-h5, the Dunsley Farm site, is large enough to accomodate 300 homes plus the infrastructure needed to support them.</p>

	<p>If 300 houses are indeed built on Greenbelt land in Tr-h5, the construction should be phased in over the lifetime of the local plan to minimize impact to infrastructure and services in Tring. Even if the development was phased in over a number of years, the extra population will put stress on local services, most notably schools. An extra primary school may be needed, and another secondary school would definitely be needed, since Tring School is currently struggling to cope with the current population. Building should not commence until all additional infrastructure has been planned and approved.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO16854
Full Name	Jon G. Wright Dawn Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p>The sites Tr-h1, Tr-h2, and Tr-h3 should be avoided since they are valued green-belt areas for the residents of Tring. In particular, Tr-h1 and Tr-h2 border Marshcroft Lane, a country lane used by dog-walkers, bicyclists, and joggers. This lane would need to be expanded, and it's character would be destroyed, if development was allowed in these areas.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p>



"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999]
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road  
Agricultural

Grade 2  
TR-H2  
Land West of Marshcroft Lane  
Agricultural  
Grade 2  
TR-H3  
Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural  
Grade 2  
TR-H4  
Land at Cow Lane  
/ Station Road  
Maintained Open Land  
Grade 2  
TR-H5  
Land at Dunsley Farm, London  
Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." <sup>20</sup> (*Emphasis added*)

*19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle*

	<i>is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16856
<b>Full Name</b>	Jon G. Wright Dawn Sanders
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a member of the Grove Field Residents Association, I am in broad agreement with their conclusions.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our <i>"feedback"</i> regarding the sites contained in the <i>"draft schedule of site appraisals"</i> and the <i>"sustainability appraisal"</i> of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the <i>"Issues and Options consultation Local Plan to 2036"</i> refers to <b>"Gorhambury Land at East Hemel Hempstead" (East Hemel Hempstead)</b> and states the area will provide <i>"...about 2500 new homes and 55ha of new employment land..."</i> and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt</p>

	surrounding Tring, for residential development to meet its "housing requirement".
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16857
<b>Full Name</b>	Robin and Patricia Hill
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>National Planning and Policy Framework (March 2017)</p> <p>There are many phrases that state explicitly that development should result in net gain to biodiversity and many of the proposals contravened will not do this.</p> <p>We must preserve the green belt in KL. Our natural environment is essential for our general health and wellbeing. It must be available for all to share. What is planning without the inclusion of areas of wild life of all kinds to include freedom of movement and involvement for all.</p> <p>Planning should be made in local communities not by remote parties.</p> <p>We are proud of KL, we require creative planning for our village centre where we can park our cars, walk and shop (presumed word difficult to read) safely. Not a sprawling subsidiary between Watford and Hemel Hempstead.</p> <p>Thoughtful plans for our future generations wellbeing.</p> <p>My objections are outlined better than I can express in the National Planning and Policy Framework but I state those which require immediate attention.</p>
<b>Include files</b>	<a href="#">LPIO16857 - Kings Langley Parish Council - Notice.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16858
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I am writing in respect of the proposals to build potentially 2500 plus new homes in Tring. Whilst I recognise that some new housing is needed in Tring, and that quotas

may be imposed by central government, I have some very major concerns as follows –

General scale of development

- 1 With potentially close to 3000 homes proposed in the worst case scenario, this would completely dwarf the scale of Tring, which has less than 5000 existing homes.
- 2 The secondary school, which is an academy, is full. Any further education provision has the potential to require schoolchildren to be bussed or driven to other schools in the area. The fact that Tring School is no longer under the Herts Education Authority means that they cannot be made to expand or take more pupils, leading to the risk of increased road traffic.
- 3 Central Tring itself has a very poor road layout, based originally on Victorian road layouts and lanes. Traffic chaos often occurs if a delivery takes place anywhere in Tring High Street at peak times due to its very narrow width. The roads which link to central Tring (e.g. Frogmore Street, Miswell Lane, Brook Street, Akeman Street) all have very narrow sections which rely on drivers giving way and are effectively one way traffic. Central Tring cannot cope with a significant increase in Traffic. There is no scope to widen or improve the traffic flows unless substantial one way systems were to be introduced and very wide scale restrictions on car parking on the roads in a Victorian Town which has no scope for parking elsewhere for the residents.
- 4 Tring Station car park is often overflowing. It is often not possible to park there on weekdays after mid morning. More homes would mean more commuters from Tring and hence the car park would become full much earlier, so a solution to this is fundamental to any development going ahead. However, the station car park is in an AONB, so cannot just be expanded.
- 5 The proposed developments all take up very large swathes of green belt land. Whilst the developers and planners say that other areas can be designated green belt in their place, this is a fundamental principle at stake. The landowners and developers who have bought green belt land at agricultural rates (when Green Belt was more sacrosanct) now stand to make a great deal of profit for themselves. It will also open the floodgates for further land speculation and development if the principle of de-classifying large swathes of Green Belt is allowed to go ahead. There have to be some clear principles invoked and very clear guidelines and rules on when Green Belt can stop being Green Belt. Not just to suit which developer puts plans forward for any area of land that they happen to own. It must also not lead to creeping development.

**Include files**

**Number**

Question 46



<b>ID</b>	LPIO16860
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>TR-H1 North of Station Road</p> <p>I was a founder member of Tring Cycling Campaign in the early 1990's and was heavily involved in lobbying for and successfully getting the cycle path to Tring Station, on what was and is a very dark and treacherous section of road.</p> <p>At that time, there was a very strong view that there should be no lighting along that stretch of road, and that it was absolutely imperative that that the rural break should be maintained between the outskirts of Tring and Tring Station. In addition, in the intervening 25 years, the drainage of this stretch of road has never been successfully sorted out, with significant flooding when there is heavy rainfall, leading to pedestrians and cyclists getting drenched by passing cars. The well used footpath and cycle path to the station is very narrow in places and is very poorly maintained. It is also a dangerous stretch of road, with fairly regular accidents at the Station Road/Cow Lane Crossroads. Adding up to 1000 (or even any) additional homes in this area, which would require cars to cross the cycle lane and footpath for access and egress, would have a major negative effect. Cyclists commuting to and from Tring Station would be extremely vulnerable on dark mornings and evenings, as they often travel at reasonable speeds and would be unable to stop if cars were coming in and out of this development.</p> <p>In addition, Tring Station would effectively become a part of Tring, and the opening up of part of this large area would inevitably lead to creeping development, again to the benefit of land speculators, as further Green Belt areas became de-classified to the north.</p> <p>Building of houses over a period of nearly two decades would lead to massive disruption on a road which is totally unsuitable for the movement of large numbers of HGV's and which is extremely hazardous in its current form.</p> <p>This area is furthest from the centre of Tring and is likely to lead to a significant increase in car use into Tring.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16861
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Tr-h2 – Land West of Marshcroft Lane and Tr-h3 – Land at Icknield Way/Grove Road (New Mill) Whilst these are areas of Green Belt, they look to impinge less on the overall expansion of Tring, and Whilst the roads which access them are not suitable for significant amounts of extra traffic, I would have less objection to some development of these areas.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16862
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Tr-h4 – Land at Cow Lane/Station Road This is a smaller scale infill, and whilst it is located at a dangerous junction, because it is South of Station Road, I would see fewer hazards and disruption in the construction and subsequent use of this area for housing development.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16863
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Tr-H5 – Land at Dunsley Farm/London Road Although this area provides a rural feeling route into Tring, out of all the options for large numbers of dwellings, I see this as having the least negative impact on Tring for the following reasons- <ul style="list-style-type: none"> <li>• The land is currently farmers fields, and as such would lend itself to a phased development</li> <li>• The land can be accessed straight off the A41 by construction traffic and the future homeowners without the need to travel through Tring or the unsuitable roads around Tring</li> </ul>

	<ul style="list-style-type: none"> <li>• I would hope that because this land is owned by Hertfordshire County Council, that they will use their ownership and influence to ensure that any development provides truly affordable housing, and is not just done for the benefit of land speculators, property developers and absentee landlords</li> <li>• It would be essential that a wide belt of trees and screening is put in place between the roads and any development</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16864
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>TRh6 – Land North of Icknield Way</p> <p>This land is on a large area which is visible from the north side of Tring. Any development here would have the significant risk that the development would continue creeping westwards to put an end to the rural Northern boundary to Tring forever.</p> <p>It is also the worst place for access to Tring Station, as cars would use the narrow roads to get across Tring to Station Road.</p> <p>There have been several attempts in the past to develop in this area. It has led to much local opposition, which has successfully prevented this development on an escarpment. In my view it is unacceptable just to sweep away any previous consultation and challenges to.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16865
<b>Full Name</b>	Mr Paul Doughty
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing in respect of the proposals to build potentially 2500 plus new homes in Tring. Whilst I recognise that some new housing is needed in Tring, and that quotas</p>

may be imposed by central government, I have some very major concerns as follows –

General scale of development

- 1 With potentially close to 3000 homes proposed in the worst case scenario, this would completely dwarf the scale of Tring, which has less than 5000 existing homes.
- 2 The secondary school, which is an academy, is full. Any further education provision has the potential to require schoolchildren to be bussed or driven to other schools in the area. The fact that Tring School is no longer under the Herts Education Authority means that they cannot be made to expand or take more pupils, leading to the risk of increased road traffic.
- 3 Central Tring itself has a very poor road layout, based originally on Victorian road layouts and lanes. Traffic chaos often occurs if a delivery takes place anywhere in Tring High Street at peak times due to its very narrow width. The roads which link to central Tring (e.g. Frogmore Street, Miswell Lane, Brook Street, Akeman Street) all have very narrow sections which rely on drivers giving way and are effectively one way traffic. Central Tring cannot cope with a significant increase in traffic. There is no scope to widen or improve the traffic flows unless substantial one way systems were to be introduced and very wide scale restrictions on car parking on the roads in a Victorian Town which has no scope for parking elsewhere for the residents.
- 4 Tring Station car park is often overflowing. It is often not possible to park there on weekdays after mid morning. More homes would mean more commuters from Tring and hence the car park would become full much earlier, so a solution to this is fundamental to any development going ahead. However, the station car park is in an AONB, so cannot just be expanded.
- 5 The proposed developments all take up very large swathes of green belt land. Whilst the developers and planners say that other areas can be designated green belt in their place, this is a fundamental principle at stake. The landowners and developers who have bought green belt land at agricultural rates (when Green Belt was more sacrosanct) now stand to make a great deal of profit for themselves. It will also open the floodgates for further land speculation and development if the principle of de-classifying large swathes of Green Belt is allowed to go ahead. There have to be some clear principles invoked and very clear guidelines and rules on when Green Belt can stop being Green Belt. Not just to suit which developer puts plans forward for any area of land that they happen to own. It must also not lead to creeping development.

In summary, my views are as follows –

- 1 I believe that many of the proposed developments are totally unacceptable and unsuitable for reasons outlined above.

- 2 I believe that the Green Belt land should absolutely not be de-classed. It has been set up for very good reasons and a lot of effort in the past has gone into maintaining this Green Belt, which is not just for Trings benefit, but for the wider South East. I would be ashamed to be part of the generation process that saw widespread abandonment of the Green Belt around Tring, as once development takes place, the effects are utterly irreversible. De-classifying Green Belt, in my view, only brings benefits and advantages to speculators and property developers and no one else.
- 3 I believe that the TR-h1 and Tr-h6 should not be allowed to go ahead in any form whatsoever, as they break completely outside the natural boundaries of Tring.
- 4 If there is a significant increase in housing, then a huge effort needs to be made to discourage car use, by the provision of high quality walking and cycling routes to and from the centre of town, the sports grounds and facilities and Tring Station. There also needs to be a significant improvement in public transport to and from Tring from the adjacent towns and Tring Station.
- 5 All the usual aspects of school, doctors, drainage, sewerage, infrastructure, on street parking etc must be considered well in advance.
- 6 The Hospitals in Watford and Stoke Manderville can barely cope with the pressure of increasing housing development in Bucks and Herts, and this has to be addressed before any large scale developments in Dacorum.
- 7 Any money flowing form any Section 106 agreements should be spent on improvements in Tring. Previously money gained form Section 106 agreements within Tring have been taken by Dacorum BC and used for schemes in Hemel Hempstead. (I have no local political affiliations, but a strong sense of what is morally right).
- 8 For Tring's narrow streets to function with a potentially very large increase in car ownership and usage, a lot of thought has to be given to parking provision for existing residents, town centre car parking and Tring Station Car Parking, all of which are often unacceptable now.
- 9 Dacorum Borough Council should keep very closely abreast of the latest rules coming out from Central Government, which is likely to put more emphasis on affordable housing, energy efficiency etc. so that we get the best moral outcome for any development in Tring, and we do not provide more housing than is truly required, or housing with a high profit margin to suit developers.
- 0 All developments should have adequate planting of trees and hedgerows to maintain the rural feel to Tring.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16874
<b>Full Name</b>	Jan Mcgrory

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16921
<b>Full Name</b>	Jan Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings</p> <p>Tring could not support the amount of development proposed ,there is no info structure to support that level of housing</p> <p>No one would shop in Tring as already parking is at a premium</p> <p>The schools are over subscribed</p> <p>We are down to one doctors practice and it can take up to 3 weeks to get an appointment</p>

	<p>I know,that we need more homes but feel that your synopsis or homes in Tring to be not thought through</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036 " refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16923
<b>Full Name</b>	Jan Mcgrory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Having read the document submitted by the grove fields residents association, I concur whole heartedly with its findings

## GFRA Response to Question 46, full document attached to question 46

We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

### Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation*



of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels... (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set

out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999]
  - Ibid, 17

ALC Conclusions Table

**SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority

of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring... Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3").

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre.

	<p>The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.</p> <p><u>Conclusion</u></p> <p>In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating <b>TR-H5</b> and <b>TR-H6</b> would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.</p> <p>The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO16926
<b>Full Name</b>	Ros Goodyear
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am objecting to the increase in housing in Bovington.</p> <ol style="list-style-type: none"> <li>1 The high street is dangerous. The road is too narrow for the volume of traffic passing through it. At the top end of the high street turning left or right into Box lane it is too narrow with cars parked at the top end for 2 cars to pass both directions. I undertood that yellow double lines were going to be implemented at the top end of the high street but so far despite improved road markings there is no sign of the yellow lines. Will it take a death or two before this is done. Lots of drivers, including myself are having to drive on the pavement too avoid a oncoming car hitting them as there is not enough room for two cars passing.</li> </ol> <p>The school capacity in the village is full. The Gp practices are overloaded</p>

	<p>There is not enough parking spaces in the village</p> <p>Site reference Bov-H2 and H3 are on green belt site and H2 is on the back of Austins Mead. I hope no plans are to increase the volume of cars in Austin Mead as it cannot cope now with the volume of cars. No-one seems to be addressing this.</p> <p>Before any new housing is agreed in Bovingdon The Council Needs to urgently and to prioritise the infrastructure of the village</p> <p>Improve the high Street to make it safer for vehicles using it.</p> <p>Increase school and Gp Practice facilities</p> <p>Create more parking in the village.</p> <p>Hope my comments will be taken into consideration?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16927
<b>Full Name</b>	Emma Parkes-McQueen
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to voice my comments on the proposed plans to build 1600 more houses in the Berkhamsted area.</p> <p>In a nut shell I am strongly against this idea. The town is already overly congested, and as far as I can see there are not extra provisions being made to build a new schools or GP surgeries, just very expensive homes.</p> <p>On paper our town looks small and inviting and on a map people will see that walking into town is easily accessible, in reality we are a steep valley and all of these intended walks will inevitable turn into car journeys.</p> <p>The proposed access routes opening the far end of the town near Field Way and Hall Park will create a rat run and I doubt that this town can take another 2000,3000, 4000 cars. Our streets are already unsafe for our children to play outside, we are just creating a more isolated society where we travel in our cars and keep our children indoors for fear of something happening to them.</p> <p>What we need to be doing is making a society more open, so more people are out in the streets, not closed off in their cars.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16930
<b>Full Name</b>	Christine Pichon

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like it to be recorded that my objections to the planning proposals for Kings Langley and district are as follows:</p> <ol style="list-style-type: none"> <li>1 This area has been subject to overdevelopment in recent years, with massive housing developments at the Paper Mill, Nash Mills and the Manor Estate.</li> <li>2 The impact of such large scale developments will only add to an already overcrowded infrastructure , i.e . more congestion on the roads, railways, drainage etc.</li> <li>3 Building on farmland is the thin end of the wedge. Once housing developments are put on farmland, no agricultural land is safe.</li> <li>4 With such large scale developments Kings Langley would become a town and would lose it's historic village character.</li> <li>5 Such a proposed large scale development on Shendish golf course will be a great loss . It is one of the few recreational facilities for local people and there is no suitable access for such a proposal. Neither has the adjoining land between Shendish Manor and Rucklers Lane have access to adequate roads to take the amount traffic that would be generated, and it is difficult to where new roads could be constructed without massive disturbance to the surrounding countryside.</li> </ol> <p>The danger of urban sprawl which ultimately could lead to Watford joining with Hemel Hempstead</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16933
<b>Full Name</b>	Mrs Alison Bickerton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We already have development approved at the western end of Tring.</p> <p>I object to any more large scale building in the town.</p> <p>I do not see any sense in cramming more and more houses into this area, where the infrastructure and local facilities are already stretched, when there are so many</p>

	<p>towns around the country in a very run down state and in need of regeneration.</p> <p>Revitalising existing towns with good affordable housing, school places and GP appt. availability together with new employment opportunities is what the country needs.</p> <p>People keep saying that we need the housing where people live but many youngsters go away to study and don't come back home. Equally many youngsters who want a job will go where the work is.</p> <p>It is also the case that green space is good for us. The Green Belt is a good place to escape from the stresses of urban life. Please DO NOT DESTROY IT.</p> <p>COUNTRYWIDE ALL PLANNING DEPARTMENTS NEED TO LOOK AT THE BIGGER PICTURE.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16935
<b>Full Name</b>	Richard Hunter
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have read the details on building further homes in Markyate and specifically the area nearest to the M1 and whilst I have no objections to further homes being built my concerns are around the current poor infrastructure in around the village specifically as follows</p> <p>Lack of parking spaces in the village generally</p> <p>Poor access in and out of the village at the London Road junction of the A5 traffic lights are needed if there are to be more houses at this end of the village</p> <p>Poor power supply issues we frequently have power cuts in the village the increase in use of power would put more strain on the power grid that currently supplies Markyate</p> <p>The current Doctors surgery is not fit for purpose</p> <p>Traffic passing through the High Street is frankly horrendous at peak times the High Street needs to be one way</p> <p>The previous housing development was a farce we have empty shop units that will never be used as promised a new doctors surgery that was never built the boards that were used to advertise the development are still in situ and the land behind it is baron and unsightly</p> <p>Aircraft frequently flying over the London Road end of the village is an ongoing issue that hasn't been resolved if you have more houses built at this end of the village</p>



	<p>then I anticipate there will be more complaints about aircraft noise from the new residents</p> <p>I currently reside here (<i>removed home address</i>) and have been a resident here for over 20 years I think the issues I have raised can be resolved relatively easily with a little effort and I would be happy to discuss any aspects of my concerns if it helps.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16939
<b>Full Name</b>	JOHN CHIPPERFIELD
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I write in concern at the proposed development of the few remaining open spaces remaining to Kings Langley village. I have been a resident there for fifteen years.</p> <p>During that time I have seen traffic build up and resources, such a medical facilities and scholl fill to overflowing, so that it is extremely difficult to obtain an appointment at the former within a week unless one is an urgent case. At the latter I know that there have been a crop of disappointments owing to over-subscription. I would also warn that the utilities supplying water, electricity and gas are stretched to breaking point. We have had roads round us closed for weeks on end in pursuit of essential repairs.</p> <p>Queues develop during both rush hours and even on Saturdays as hordes of vehicles strain to pass through the arterial roads of the High Street and Station Road - Primrose Hill. Further development gives me no confidence that such situations will be alleviated. We have seen the massive housing project that is the former Oualtine Factory, cramming an unbelievable amount of homes onto the site, each with its claim on sewers as well as the utilities. Though it has been a sympathetic redevelopment on a Brownfield Site, it has nevertheless transformed Kings Langley to the upper limit of what defines a real village.</p> <p>My son Mark lost out on a job owing to a 500 'bus failing to arrive, struggling through congested streets on its way to Watford. He has had to remain in an underpaid position for now; the post he forfeited would have offered him far greater chance of promotion as well as comradship with a school friend. 'Buses often fail to arrive as matters stand now: what will be out situation when the massive agglomeration of 'Hemelford' arrives?</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO16940
<b>Full Name</b>	JOHN CHIPPERFIELD
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Wayside Farm is one of two dairy farms in the Dacorum Borough, but unique in the county for its Jersey cows and the enterprising production of 'raw milk' to the public, of which I am a beneficiary and enthusiastic advocate. The site is traversed by public footpaths which take one out of the crowded everyday scene to areas of natural beauty and tranquillity. If you haven't visited Wayside Farm, please do.
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO16944
<b>Full Name</b>	Paul Field
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to you with regards to the consideration to suitable land for major housing development around the North part of Hemel Hempstead.</p> <p>There are two main items I would like to bring to your attention.</p> <p>The first is air traffic noise.</p> <p>I live in the Woodhall farm area of Hemel and have recently (over the last year or so) noticed the increase in air traffic noise.</p> <p>Having contacted Luton airport, I was informed that they had re-routed their aircraft and the majority now use a corridor between Woodhall farm and Redbourne.</p> <p>This was done, (in their words) to ensure that it was the least sparsely populated area of Hemel and by re-routing the aircraft to that particular flight path, it would lessen the impact of the people living in the more 'build up areas' of Hemel.</p> <p>So, my questions are:-</p> <ol style="list-style-type: none"> <li>1 Have Luton airport been consulted?</li> <li>2 Has consideration/testing been completed re the noise level at any of the new proposed housing areas?</li> </ol>

	<p>3 If so, what was the outcome? (I recently had a noise monitor in my garden and I am lead to believe that some aircrafts noise levels were of an issue).</p> <p>My other item is water.</p> <p>I am aware that the majority of our area is supplied water from a underground 'well'. I am aware that the level/volume of water in this 'well' is diminishing year on year and this could be a major issue if we were required to supply water to the number of homes that have been suggested in the Hemel area.</p> <p>I would be grateful for a reply and I would also be interested in attending any public meetings in relation to the site proposals and quantities of housing suggested.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16946
<b>Full Name</b>	Mr Derek Benson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would wish to make the following observations regarding the proposed developments in Bovingdon.</p> <p>Additional housing is inevitable but needs to be carefully considered alongside the 900 houses being built between Bovingdon and Chesham</p> <p>It is reasonable to assume at least 50% of those residents will turn left toward Bovingdon and wider Dacorum. The Chesham Road/Box Lane is regularly gridlocked and further development will exacerbate this.</p> <p>This issue along with flooding in Ley Hill Road (adjacent to Loveday's) has been reported to HCC but consistently ignored. The Green Lane proposal is particularly prone to flooding. Who is responsible for a drainage plan?</p> <p>I think it is reasonable to assume Dacorum and HCC are in dialogue, and will not pass the buck to the other.</p> <p>Bovingdon Primary is an academy and as such can do what it likes in terms of its admission policy. Were it to restrict admission to Bovingdon residents, it may well be able to absorb the impact of development. Good luck with getting them to listen; they are a business and will admit those children who fit their business model regardless of where they live.</p>

	<p>Are you developing a traffic management strategy? The High Street, Green Lane, Chesham Road are often quoted but it goes beyond that. None of the proposed developments offer anything other than further congestion and certainly offer no solutions. If it is not a condition placed on developers to incorporate Road and infrastructure improvements, then why not?</p> <p>I accept more housing is needed but short term thinking will simply lead to long term problems.</p> <p>Are the planning committee happy with this as their legacy?</p> <p>I look forward to your response answering the questions posed above.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LP1016949
<b>Full Name</b>	mr stephen lewis
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to put forward my views for the proposed housing sites for Bovingdon.</p> <p>I do not think that the amount of housing being recommended at the 4 sites is practical because of the following points;-</p> <p>1/ The schools, road infrastructure, doctors, shopping areas and parking can not cope in the village as it is, so cannot sustain further mass housing and people population.</p> <p>2/ Using up of existing open spaces within the village area itself is not beneficial to the villagers well being, jamming more housing in an already dense housing for a supposed village location.</p> <p>4/ I am all for improving the village, but what is happening with the site from the petrol station/ jaguar garage that has been an eyesore for many years now, it looks a absolute eyesore.This could be used as a car parking area for the shops that become grid locked as nobody can park in village centre.</p> <p>5/ It should be obvious that with the proposed sites that the road network through the village would not cope, it</p>

	<p>was never designed for that number of housing developments.</p> <p>6/ Personally I would have thought that the airfield areas / brownfield could be much better used and also a road could be installed at the old A41 for access to a large development including a school, doctors etc, a proper infrastructure.</p> <p>7/ All that the council seem to want to do is jam in more housing on already busy cramped housing areas, not build a proper infrastructure. This seems to be a cheap "fix" to a housing issue that is not being correctly addressed.</p> <p>8/ I have lived in the village for around 20 years and have seen it become increasingly busy without any action being taken housing, schooling, doctors, pedestrian walks etc. If some or all this housing goes ahead the village centre will become grid locked at busy times.</p> <p>If you would like to hear any more of my views in detail, then please let me know as I would like to help plan the village for the future generations.</p> <p>I probably would not want to stay in the village if all the housing proposals go ahead, I move to Bovingdon 20 years ago to get away from over housed and badly planned developments.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16951
<b>Full Name</b>	Terry Godber
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Following from the recent public review meeting concerning housing proposals in Tring and in Dacorum as a whole my observations and comments focus on proposals outlined for Tring.</p> <p>There's need to develop and increase the nations supply of housing and since current restrictions serve to progressively force ever higher development land prices I have no issues with principles of development of the scale concerned on selected greenfield site areas. That said, there are it seems several significant factors which should be recognised, accounted for and planned for before any firm decisions with respect to this scale of</p>

future housing provision in Tring is considered and finalised.

- Any development proposal should consider and account for the necessary co-related public infrastructure requirements. These must be planned for and progressively installed in parallel with the increased housing in order that we progressively retain a sense of place and sustain the character of our town as best we can throughout the period concerned. It is your long term duty to ensure that a 'whole town' successful solution can be achieved delivering these objectives. To allow development without due consideration of such factors would be to fail all concerned.
- The considerations are services installations - gas water electricity sewers and surface water drainage together with associated highways and transport infrastructure services.
- These should all be considered together and before permissions to develop are granted. Strategic town plans ought to be developed now in order that we accommodate and allocate space for the increased demands on town centre retail, schools, library dental and medical facilities and to ensure that we suitably provide adequate amenities for new sport and public activities too.
- - Whilst Tring can never be a new town, the strategy which should be being adopted when considering to expand any town by more than 60% and especially one which is immediately surrounded by other developments as described above should be one which reconsiders how the town which then results will develop over time such that it can still retain a heart and sustain its existing spirit of unity as we go forwards.
  - From recent discussions and a review of published proposals I see no real evidence that any of these factors are really under consideration.  
What exactly is your intent?  
What precisely are you doing to address such concerns before you commit to an ill considered solution?

In more specific detail:

#### TRANSPORT

- Whilst rail services exist at Tring Station there's need to recognise from the outset that the existing station can offer very little increased commuter capacity.
- The station car park is constrained by headroom limits imposed by the planning authorities to preserve uninterrupted views of the Chilterns and the current recently expanded parking provisions already operate at capacity due in part to the effects of those travelling to Tring station from the expanded surrounding villages.

- Even if increased public bus transport were to be provided to deliver users to the station the trains in question are already frequently full at anything close to peak hours and you do need to recognise that the potential to increase their frequency and capacities has already been largely expended too.
- Therefore it seems that transport will necessarily be focussed on the car and existing road installations and since there's little real chance that existing spartan public bus services will suddenly be increased sufficiently that they will significantly reduce the use of private transport, then there's also needs to re plan the key highways to accommodate the increased journey numbers which will ensue from these large scale domestic development proposals.
- The key highway in the area is clearly the A41 dual to towards London and Aylesbury. The development proposals are largely located remote from this route in positions which will have difficulties accessing to it without a good proportion of the traffic concerned travels to and indeed through parts of the town. This is not good for our environment.
- The highways which serve traffic onto the A41 from the development sites are Icknield Way / Bulbourne Road, Station Road and Cow Lane. Two of these Station Road and Cow Lane are substandard construction and deliver traffic to the A41 via what can only be described as dangerous and difficult junctions. The roads and the two junctions concerned will need to be upgraded to allow safe access for increased traffic joining the A41 from this area. The majority of traffic from the proposed primary development areas will elect to use one or both of these roads to access the A41.
- Due to existing constrictions very few will elect to travel along Brook Street. Grove Road already suffers heavily increased traffic numbers despite traffic calming measures by those seeking to avoid it.
- Coming from the Bulbourne Road onto Icknield Way dictates passing over the Brook Street / Icknield Way roundabout - already a dangerous junction due to speeds, the existing pressures of traffic and limited sightlines at the roundabout.
- Perhaps these last two paragraphs should suggest that there might be some advantage in changing the balance of development and increasing the scope of that which joins Icknield Way from the fields which are located canal side of it. This would then at least allow that those concerned join it beyond the roundabout and travel to the A41

at the top of town without heading towards the town centre first. Smoother and easier traffic flows = less pollution.

Will you be considering these issues at the appropriate stage?

#### TOWN CENTRE

- As a former market town Tring still retains a town centre which is focussed in the middle of the old town. With the exception of Tesco we have avoided devolution to a series of segregated retail parks and have been able to retain a public market in the centre of the old retail areas.
- The town has avoided the ribbon development which has blighted Hemel Hempstead and progressively threatens Berkhamsted today.
- We are also perhaps very fortunate to still have closely related underused public areas which offer potential that we could potentially retain a scaled up retail facility very closely centred on the existing town centre if we plan for it now.
- There is an area located to the rear of the town centre car park between the existing retail areas and the Red Cross hall which is currently an open public area. Because it fails to allow for sports fields since its set in a dip it is underused and in fact only comes into its own when it snows - once every five years when for a few days it serves the town well. This same area could become a purpose designed and closely related area used to expand the parking and retail provisions which serve the town. We need the foresight and perhaps the determination to seize on this potential at this stage and we should re-designate the area concerned so that it can become used accordingly.

Can you undertake to consider this option?

#### EDUCATION

- The town currently has one oversized secondary school and three JMI schools. I believe that Grove School is the largest JMI in County and the other JMI schools are not far behind. Tring School is now already too large for the site on which it's sited today and struggles to contain the numbers which it already serves.
- Any strategy which proposes to allocate provision for 60% more houses should be planning and allocating space for 60% more school provision yet there's no real evidence of this in the documents made available for public review.

Simply why not?



- Again the placement of development East of town is such that it will only serve to exacerbate pressures on Grove School and Tring School due to proximities.
- It may be only sensible to accept that this placement is reconsidered with greater provision for both housing and for education sited alongside alongside the Icknield Way - here a school can serve the West side of town and out of County children who come in from the surrounding villages may elect to use it too. provisions here will at the same time relieve pressures on Tring School and Grove School allowing that they can then better serve the increased scale of development on the adjacent East side.
- It is currently the case that multiple double-decker buses are being used to deliver students to and from Tring School and since these are traversing local estate roads which were certainly not designed to accommodate them where they struggle to pass and traverse the corners and cross access to Grove School then it's probably only a matter of time before one or more children are very seriously injured or even killed in the daily mêlée of vehicles being used to deliver children to these overpopulated facilities.
- Surely you must plan and allocate space for education facilities today as you plan to expand the town - these are not add on items or after thought items, they dictate that you make adequate spatial provisions to accommodate them. Schools are essential provisions and you fail society as a whole by failing to make and allocate appropriate and proportionate provision for them now.

#### SPORT AND PUBLIC SPACE

- Tring is surrounded by publicly accessible space and is fortunate to enjoy ready access to Tring Park, Aldbury and Wendover and large tracts of these areas serve to enhance our amenity and facilitate our enjoyment of the district.
- Sports field facilities are less prevalent. Provision at Tring School has been eroded over the past years and now with only shared and limited provisions at the schools, some publicly accessible fields North of Icknield Way and South of Cow Lane and fields associated with the Cricket and Tennis Clubs adjacent Station Road there's need to make more provisions.
- We have potential since new housing is to be developed at the peripheries of the town then proportionate parts of each of these areas can be devoted to sports field purposes. It is of no matter that such areas are currently green field areas since when

	<p>they are put to such uses they will substantially remain green and sightlines which might be denied in other parts can be preserved in areas allocated for these uses.</p> <ul style="list-style-type: none"> <li>• Whilst there should be sports provision co-located with any new school, please ensure that each new housing scheme also allocates space for infant play areas and for public sports fields proportionate to their scale. Perhaps unlike retail it's entirely appropriate that such provisions are diversified where they can have a close proximity to those who may have needs to use them on a regular basis.</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO16962
<b>Full Name</b>	Chris Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>

**Include files**

GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf

Number	Question 46
ID	LPIO17009
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46

ID	LPIO17011
Full Name	Chris Pike
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Please register my support for this report by Grove Fields Residents Association.</p> <p>I support this whole heartedly.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our <i>"feedback"</i> regarding the sites contained in the <i>"draft schedule of site appraisals"</i> and the <i>"sustainability appraisal"</i> of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the <i>"Issues and Options consultation Local Plan to 2036"</i> refers to <i>"Gorhambury Land at East Hemel Hempstead"</i> (<b>East Hemel Hempstead</b>) and states the area will provide <i>"...about 2500 new homes and 55ha of new employment land..."</i> and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p> <p>In addition we note that the DBC's <i>"Stage 2 Green Belt Review and Landscape Appraisal – Report"</i> (<b>GBR/2</b>) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:</p>

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999]
  - *Ibid*, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

#### **Location**

#### **Use**

#### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table



**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an

over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations*..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17019
<b>Full Name</b>	Jade Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>In my opinion, further examination, including linkage with neighbouring authorities and infrastructure requirements, is necessary in order to demonstrate that the release of green belt land is proportionally necessary to meet housing need.</p> <p>I feel strongly that the green belt at Tring should continue to be protected from development in order to serve the local community that enjoys it at present. The AONB also requires protection from the urban sprawl, and this should be maintained.</p> <p>This particularly applies to sites TR-H1, TR-H2 and TR-H3 where development would cause significant harm to the environment, the local community and the AONB. Development of these sites should therefore not be part of the Final Local Plan as far as I am concerned.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17066
<b>Full Name</b>	Jade Holmes
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.

I feel strongly that the green belt at Tring should continue to be protected from development in order to serve the local community that enjoys it at present. The AONB also requires protection from the urban sprawl, and this should be maintained.

This particularly applies to sites TR-H1, TR-H2 and TR-H3 where development would cause significant harm to the environment, the local community and the AONB. Development of these sites should therefore not be part of the Final Local Plan as far as I am concerned.

**GFRA Response to Question 46, full document attached to question 46**

We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17068
<b>Full Name</b>	Jade Holmes
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I attach a report by planning consultants that reflects my personal views on the development proposals for Dacorum that have been presented for comment.</p> <p>I feel strongly that the green belt at Tring should continue to be protected from development in order to serve the local community that enjoys it at present. The AONB also requires protection from the urban sprawl, and this should be maintained.</p> <p>This particularly applies to sites TR-H1, TR-H2 and TR-H3 where development would cause significant harm to the environment, the local community and the AONB. Development of these sites should therefore not be part of the Final Local Plan as far as I am concerned.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "<i>...about 2500 new homes and 55ha of new employment land...</i>" and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved...</i></p> <p><i>This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "*...exceptional circumstance...*" in accordance with the NPPF to "*...justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential

development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999]
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3").

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one



of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the

settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17076
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p>I am writing to record my view that the proposed developments on the Green Belt Land to the East of Tring, In particular the Grove Fields site is an unwise and unnecessary use of one of our most valuable assets as a community.</p> <p>The land that surrounds this town in its area of outstanding natural beauty is very precious and once removed from its current greenbelt status can never be recovered.</p> <p>The character of the town depends to a large extent on its clear boundaries and the infrastructure of the town cannot safely sustain more traffic on the existing road network.</p> <p>The only exception to this in my mind would be the land at Dunsley Farm which abuts the major road network and can feed traffic safely onto the existing dual carriageway.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p> <p><b>Q48</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17123
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p>I am writing to record my view that the proposed developments on the Green Belt Land to the East of Tring, In particular the Grove Fields site is an unwise and unnecessary use of one of our most valuable assets as a community.</p> <p>The land that surrounds this town in its area of outstanding natural beauty is very precious and once removed from its current greenbelt status can never be recovered.</p> <p>The character of the town depends to a large extent on its clear boundaries and the infrastructure of the town cannot safely sustain more traffic on the existing road network.</p> <p>The only exception to this in my mind would be the land at Dunsley Farm which abuts the major road network and can feed traffic safely onto the existing dual carriageway.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036 " refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt</p>

	surrounding Tring, for residential development to meet its "housing requirement".
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17125
<b>Full Name</b>	Grahame Senior
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I support and endorse the views expressed in the attached document as a member of GFRA</p> <p>I am writing to record my view that the proposed developments on the Green Belt Land to the East of Tring, in particular the Grove Fields site is an unwise and unnecessary use of one of our most valuable assets as a community.</p> <p>The land that surrounds this town in its area of outstanding natural beauty is very precious and once removed from its current greenbelt status can never be recovered.</p> <p>The character of the town depends to a large extent on its clear boundaries and the infrastructure of the town cannot safely sustain more traffic on the existing road network.</p> <p>The only exception to this in my mind would be the land at Dunsley Farm which abuts the major road network and can feed traffic safely onto the existing dual carriageway.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide</p>

"...about 2500 new homes and 55ha of new employment land..." and that the DBC:

"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999]
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural  
Grade 2  
TR-H2  
Land West of Marshcroft Lane  
Agricultural  
Grade 2  
TR-H3  
Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural  
Grade 2  
TR-H4  
Land at Cow Lane  
/ Station Road  
Maintained Open Land  
Grade 2  
TR-H5  
Land at Dunsley Farm, London  
Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 *(Emphasis added)*

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.



20 *The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of

any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential

	<p>development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17147
<b>Full Name</b>	Mararet and Alan Savage
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my views on the planning proposals.</p> <p>I fail to understand why such a large number have been suggested !!,</p> <p>At present the supporting services I.e Drs. Schools etc are stretched to the limit .</p> <p>The traffic congestion is a nightmare.there are not enough provisions for car parks . Nor is there any space on which to build them,,</p> <p>Has the need for supported infrastructure been considered . ?.</p> <p>I would imagine that the governments edict to provide more homes has been the driving force behind these proposals ,,,</p> <p>Surely a better option would have been to allow more social housing to be built ?</p> <p>But that would have not satisfied the building companies.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17150
<b>Full Name</b>	Nikki Hamilton
<b>Company / Organisation</b>	Herts & Middlesex Badger Group
<b>Position</b>	Unknown
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	Having accessed some of our records, we can confirm that some of the proposed development areas around Tring would not give us such a cause for concern as others and we would be happy to discuss these with you.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17151
<b>Full Name</b>	Joel Morrissey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to log my objection to proposals to develop and build in and around the Kings Langley area.</p> <p>Firstly I chose to live in a village and bring my family up in a village community, not a small town. By building the number of houses outlined in your plan you will change the fabric and character of the village.</p> <p>Secondly, I do not believe the plans shown are sustainable in a number of areas:</p> <ol style="list-style-type: none"> <li>1 Roads - the roads around Kings Langley can barely cope with the traffic at the moment. If you try to join the M25 after 7am traffic is already queueing back towards the village centre. If you try to drive through the village centre at 'peak periods' there is congestion.</li> <li>2 Trains - the trains at the moment struggle to cope with the volume of commuters from Kings Langley. I get the 7.07am (now 7.08am) everyday and rarely get a seat - Tuesday this week I could not get on it at all - and there are three more stops to fill up on the way to London Euston. I pay £4,004 for the privilege, but that is another matter and I appreciate not your concern. However my point is it is creaking at the moment.</li> <li>3 Schools - I do not believe the schools will be able to cope with the increased population and will become oversubscribed.</li> <li>4 GP's - At the moment if you want an appointment you have to wait a number of days, they will become even more stretched.</li> </ol> <p>I am sure there is a need for additional housing, but I am equally certain there are better locations that can fully support additional populations without changing the character or quality of life enjoyed by the current residents.</p>
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO17153
<b>Full Name</b>	Connor Church
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my deep concerns regarding the proposed build on Bovingdon's green belt land.</p> <p>Firstly, I feel with the confirmed agreement to build 60 new houses on Molyneux Avenue, in addition to the 20 plus council dwellings in Hyde Meadows already in place, any new proposals will damage the quality of life in Bovingdon as the village will inevitably struggle to cope with the sudden and significant increase in population. I feel this issue has not been addressed and is being ignored at the village's expense.</p> <p>The four proposed sites would also result in the loss of green belt and ultimately conflicts with Dacorum's strategy to protect green belt land and safeguard the countryside.</p> <p>Existing issues in the village will only become more apparent should the proposals go ahead. A rise in population would cause the struggling drainage system to be put under even more pressure than it already is, as highlighted in October 2016 when the village flooded to the point where cars were submerged under water. Homefield itself regularly experiences large amounts of rainwater running down the road. The loss of the field would cause an increase in the volumes of water funnelling down towards Green Lane and the bottom of the village, subsequently increasing the risk of flooding even further. Green Lane is also a highly congested road that is already difficult to navigate and any additional plans to increase the traffic is completely unsustainable without changes to the infrastructure. Furthermore, Bovingdon's High Street struggles to cope with the current amount of traffic that flows through it, with vehicles regularly having to mount pavements at the expense of the pedestrians' safety in order to avoid becoming stuck by the opposing vehicles. It should be noted that Bovingdon has no significant places of employment meaning any new resident would have to commute in and out of the village on a daily basis ultimately placing the village's infrastructure under additional pressure, thus having a detrimental effect on the village as a whole.</p> <p>Schooling has been a well-established issue within the village in recent years as local residents struggle to find appropriate secondary schooling places for their children due to the scarce number of vacancies available in surrounding schools. It is only logical to suggest that any notable expansion in the village's population will cause this particular problem becoming more significant which</p>

	<p>will undoubtedly put additional strain on the residents of Bovingdon.</p> <p>It is clear that there are major health and safety issues that haven't been considered with the proposal, in particular with the site located in Homefield. The turning out of the road is a 'blind corner' where drivers are unable to see onto Green Lane (the road they are turning onto). Should this particular proposal go ahead, the increase in traffic being diverted onto Homefield will unnecessarily but certainly lead to a rise in traffic incidents in the specified area.</p> <p>Finally I would like to remind you that Bovingdon is a designated conservation area that should be protected from such drastic development plans.</p> <p>For the reasons listed above, my strongly held belief is that Bovingdon is better left untouched for the foreseeable future regarding any development. I hope the concerns raised are taken into consideration seriously.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17154
<b>Full Name</b>	Connor Church
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my deep concerns regarding the proposed build on Bovingdon's green belt land.</p> <p>Firstly, I feel with the confirmed agreement to build 60 new houses on Molyneux Avenue, in addition to the 20 plus council dwellings in Hyde Meadows already in place, any new proposals will damage the quality of life in Bovingdon as the village will inevitably struggle to cope with the sudden and significant increase in population. I feel this issue has not been addressed and is being ignored at the village's expense.</p> <p>The four proposed sites would also result in the loss of green belt and ultimately conflicts with Dacorum's strategy to protect green belt land and safeguard the countryside.</p> <p>Existing issues in the village will only become more apparent should the proposals go ahead. A rise in population would cause the struggling drainage system to be put under even more pressure than it already is, as highlighted in October 2016 when the village flooded to the point where cars were submerged under water. Homefield itself regularly experiences large amounts of rainwater running down the road. The loss of the field would cause an increase in the volumes of water funnelling down towards Green Lane and the bottom of the village, subsequently increasing the risk of flooding</p>

	<p>even further. Green Lane is also a highly congested road that is already difficult to navigate and any additional plans to increase the traffic is completely unsustainable without changes to the infrastructure. Furthermore, Bovingdon's High Street struggles to cope with the current amount of traffic that flows through it, with vehicles regularly having to mount pavements at the expense of the pedestrians' safety in order to avoid becoming stuck by the opposing vehicles. It should be noted that Bovingdon has no significant places of employment meaning any new resident would have to commute in and out of the village on a daily basis ultimately placing the village's infrastructure under additional pressure, thus having a detrimental effect on the village as a whole.</p> <p>Schooling has been a well-established issue within the village in recent years as local residents struggle to find appropriate secondary schooling places for their children due to the scarce number of vacancies available in surrounding schools. It is only logical to suggest that any notable expansion in the village's population will cause this particular problem becoming more significant which will undoubtedly put additional strain on the residents of Bovingdon.</p> <p>Finally I would like to remind you that Bovingdon is a designated conservation area that should be protected from such drastic development plans.</p> <p>For the reasons listed above, my strongly held belief is that Bovingdon is better left untouched for the foreseeable future regarding any development. I hope the concerns raised are taken into consideration seriously.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17155
<b>Full Name</b>	Connor Church
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my deep concerns regarding the proposed build on Bovingdon's green belt land.</p> <p>Firstly, I feel with the confirmed agreement to build 60 new houses on Molyneux Avenue, in addition to the 20 plus council dwellings in Hyde Meadows already in place, any new proposals will damage the quality of life in Bovingdon as the village will inevitably struggle to cope with the sudden and significant increase in population. I feel this issue has not been addressed and is being ignored at the village's expense.</p> <p>The four proposed sites would also result in the loss of green belt and ultimately conflicts with Dacorum's</p>

strategy to protect green belt land and safeguard the countryside.

Existing issues in the village will only become more apparent should the proposals go ahead. A rise in population would cause the struggling drainage system to be put under even more pressure than it already is, as highlighted in October 2016 when the village flooded to the point where cars were submerged under water. Homefield itself regularly experiences large amounts of rainwater running down the road. The loss of the field would cause an increase in the volumes of water funnelling down towards Green Lane and the bottom of the village, subsequently increasing the risk of flooding even further. Green Lane is also a highly congested road that is already difficult to navigate and any additional plans to increase the traffic is completely unsustainable without changes to the infrastructure. Furthermore, Bovingdon's High Street struggles to cope with the current amount of traffic that flows through it, with vehicles regularly having to mount pavements at the expense of the pedestrians' safety in order to avoid becoming stuck by the opposing vehicles. It should be noted that Bovingdon has no significant places of employment meaning any new resident would have to commute in and out of the village on a daily basis ultimately placing the village's infrastructure under additional pressure, thus having a detrimental effect on the village as a whole.

Schooling has been a well-established issue within the village in recent years as local residents struggle to find appropriate secondary schooling places for their children due to the scarce number of vacancies available in surrounding schools. It is only logical to suggest that any notable expansion in the village's population will cause this particular problem becoming more significant which will undoubtedly put additional strain on the residents of Bovingdon.

It is clear that there are major health and safety issues that haven't been considered with the proposal, in particular with the site located in Homefield. The turning out of the road is a 'blind corner' where drivers are unable to see onto Green Lane (the road they are turning onto). Should this particular proposal go ahead, the increase in traffic being diverted onto Homefield will unnecessarily but certainly lead to a rise in traffic incidents in the specified area.

Finally I would like to remind you that Bovingdon is a designated conservation area that should be protected from such drastic development plans.

For the reasons listed above, my strongly held belief is that Bovingdon is better left untouched for the foreseeable future regarding any development. I hope the concerns raised are taken into consideration seriously.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17156
<b>Full Name</b>	Connor Church



<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my deep concerns regarding the proposed build on Bovingdon's green belt land.</p> <p>Firstly, I feel with the confirmed agreement to build 60 new houses on Molyneux Avenue, in addition to the 20 plus council dwellings in Hyde Meadows already in place, any new proposals will damage the quality of life in Bovingdon as the village will inevitably struggle to cope with the sudden and significant increase in population. I feel this issue has not been addressed and is being ignored at the village's expense.</p> <p>The four proposed sites would also result in the loss of green belt and ultimately conflicts with Dacorum's strategy to protect green belt land and safeguard the countryside.</p> <p>Existing issues in the village will only become more apparent should the proposals go ahead. A rise in population would cause the struggling drainage system to be put under even more pressure than it already is, as highlighted in October 2016 when the village flooded to the point where cars were submerged under water. Homefield itself regularly experiences large amounts of rainwater running down the road. The loss of the field would cause an increase in the volumes of water funnelling down towards Green Lane and the bottom of the village, subsequently increasing the risk of flooding even further. Green Lane is also a highly congested road that is already difficult to navigate and any additional plans to increase the traffic is completely unsustainable without changes to the infrastructure. Furthermore, Bovingdon's High Street struggles to cope with the current amount of traffic that flows through it, with vehicles regularly having to mount pavements at the expense of the pedestrians' safety in order to avoid becoming stuck by the opposing vehicles. It should be noted that Bovingdon has no significant places of employment meaning any new resident would have to commute in and out of the village on a daily basis ultimately placing the village's infrastructure under additional pressure, thus having a detrimental effect on the village as a whole.</p> <p>Schooling has been a well-established issue within the village in recent years as local residents struggle to find appropriate secondary schooling places for their children due to the scarce number of vacancies available in surrounding schools. It is only logical to suggest that any notable expansion in the village's population will cause this particular problem becoming more significant which will undoubtedly put additional strain on the residents of Bovingdon.</p> <p>It is clear that there are major health and safety issues that haven't been considered with the proposal, in</p>

	<p>particular with the site located in Homefield. The turning out of the road is a 'blind corner' where drivers are unable to see onto Green Lane (the road they are turning onto). Should this particular proposal go ahead, the increase in traffic being diverted onto Homefield will unnecessarily but certainly lead to a rise in traffic incidents in the specified area.</p> <p>Finally I would like to remind you that Bovingdon is a designated conservation area that should be protected from such drastic development plans.</p> <p>For the reasons listed above, my strongly held belief is that Bovingdon is better left untouched for the foreseeable future regarding any development. I hope the concerns raised are taken into consideration seriously.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LP1017158
<b>Full Name</b>	Jacqui Manton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object to the proposed development in Bovingdon of 360 homes. This is in addition to the 90 homes in the existing plan.</p> <p>As a long term resident of Bovingdon I have seen no improvement in infrastructure since I have been here and without any significant improvement I can't see how the village can sustain 450 homes let alone 90 homes.</p> <p>The High Street can barely cope with the amount of traffic, especially on Saturday mornings and on the school runs. The end of the High Street where the kebab shop is located can only cope at the moment with traffic coming in one direction. Vehicles regularly need to give way on this road already. Also, the turning into Old Dean is regularly very difficult to navigate, due to people irresponsibly parking on the yellow lines. You might argue that people will walk to the village but this is not the case for the vast majority of the residents who are going to work or other duties after they have visited the village to drop off children or to shop.</p> <p>From what I understand the Bovingdon Academy is at near capacity, the Secondary Schools are over subscribed and as it can be very difficult to get an appointment at the GP surgery.</p> <p>I purposely moved to the village for the relative safety and tranquility of village life and a place to bring up my family. A build of 360 houses would ruin the character of this charming village and blight the life of many of us who live there.</p>

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17159
<b>Full Name</b>	MR ROBERT FARRER
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my strong objection to plans for a massive increase in housing in Berkhamsted over the next decade.</p> <p>My objections are as follows:</p> <ol style="list-style-type: none"> <li>1) The bulk of the new homes would be on green belt land. If the notion of a 'green belt' is to be ignored in this way then there would be no limit to urban sprawl over our lovely countryside.</li> <li>2) Despite claims that there has been a "sustainability study", it is clear that there has only a token 'tick box' exercise to sweeten a very bitter pill. Development on this scale cannot possibly be 'sustainable' without proper attention to jobs, transport, infrastructure, health service provision and schooling.</li> <li>3) If the development goes ahead, even in a diluted form, the new population will have few local jobs as Berkhamsted has little industry. This means that newcomers will be expected to commute to London for the sort of jobs with salaries sufficient to pay these new large mortgages. Alas, the morning trains are already full. Driving to London can take two hours or more.</li> <li>4) No doubt the investors (GUI) who have bought the land in south Berkhamsted will all be multi-millionaires if they can convert fields into houses, but I cannot see why we should suffer for their gain.</li> <li>5) The plan to build a new estate next to the railway in Northchurch on land less than 20 metres from the busiest railway in Europe, with trains passing at 140 mph every two minutes is certainly not 'sustainable' for the mental health of any victim forced to live there.</li> </ol> <p>In short, I see these plans as poorly thought-through attempts to make a quick fortune for a few developers. Berkhamsted has already agreed to a large expansion which is now being realised.</p> <p>If allowed, these massive additions will ruin Berkhamsted forever.</p> <p>Therefore I vote for option 1b.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17160
<b>Full Name</b>	MR ROBERT FARRER

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my strong objection to plans for a massive increase in housing in Berkhamsted over the next decade.</p> <p>My objections are as follows:</p> <ol style="list-style-type: none"> <li>1) The bulk of the new homes would be on green belt land. If the notion of a 'green belt' is to be ignored in this way then there would be no limit to urban sprawl over our lovely countryside.</li> <li>2) Despite claims that there has been a "sustainability study", it is clear that there has only a token 'tick box' exercise to sweeten a very bitter pill. Development on this scale cannot possibly be 'sustainable' without proper attention to jobs, transport, infrastructure, health service provision and schooling.</li> <li>3) If the development goes ahead, even in a diluted form, the new population will have few local jobs as Berkhamsted has little industry. This means that newcomers will be expected to commute to London for the sort of jobs with salaries sufficient to pay these new large mortgages. Alas, the morning trains are already full. Driving to London can take two hours or more.</li> <li>4) No doubt the investors (GUI) who have bought the land in south Berkhamsted will all be multi-millionaires if they can convert fields into houses, but I cannot see why we should suffer for their gain.</li> </ol> <p>In short, I see these plans as poorly thought-through attempts to make a quick fortune for a few developers. Berkhamsted has already agreed to a large expansion which is now being realised.</p> <p>If allowed, these massive additions will ruin Berkhamsted forever.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17161
<b>Full Name</b>	MR ROBERT FARRER
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my strong objection to plans for a massive increase in housing in Berkhamsted over the next decade.</p> <p>My objections are as follows:</p>

	<p>1) The bulk of the new homes would be on green belt land. If the notion of a 'green belt' is to be ignored in this way then there would be no limit to urban sprawl over our lovely countryside.</p> <p>2) Despite claims that there has been a "sustainability study", it is clear that there has only a token 'tick box' exercise to sweeten a very bitter pill. Development on this scale cannot possibly be 'sustainable' without proper attention to jobs, transport, infrastructure, health service provision and schooling.</p> <p>3) If the development goes ahead, even in a diluted form, the new population will have few local jobs as Berkhamsted has little industry. This means that newcomers will be expected to commute to London for the sort of jobs with salaries sufficient to pay these new large mortgages. Alas, the morning trains are already full. Driving to London can take two hours or more.</p> <p>5) The plan to build a new estate next to the railway in Northchurch on land less than 20 metres from the busiest railway in Europe, with trains passing at 140 mph every two minutes is certainly not 'sustainable' for the mental health of any victim forced to live there.</p> <p>In short, I see these plans as poorly thought-through attempts to make a quick fortune for a few developers. Berkhamsted has already agreed to a large expansion which is now being realised.</p> <p>If allowed, these massive additions will ruin Berkhamsted forever.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17163
<b>Full Name</b>	Philip Krajewski
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to strongly object the proposed development of Green Belt sites in and around Kings Langley. The infrastructure to cope with a development of this magnitude just does not exist.</p> <p>*the schools in the area are already oversubscribed</p> <p>*the doctors surgeries are already overworked</p> <p>*the roads are already struggling to cope with heavy traffic</p> <p>*developments over recent years have caused major parking issues (cars are parked blocking the pavement on Red Lion Lane/Nash Mills Lane 24/7. Anyone trying to get through with a pushchair or wheelchair has to walk in the road - not exactly safe !)</p> <p>*the character of the village will disappear, it will become a town</p>

	<p>*Wayside Farm is one of only two working Jersey herds in Hertfordshire and is a valuable asset to the local community</p> <p>*Rectory Farm is classed as an area of outstanding natural beauty, this will not be enhanced in any way by the building of houses on the site</p> <p>*the damage to wildlife and the landscape will be irreparable</p> <p>Whilst I appreciate there may be a need for new homes, I do not believe that the answer is in the development of green belt land. Please listen to the views and concerns of local residents. We are not throwing tantrums, but rather voicing real concerns for the future of our community. The plan to more than double the size of the village is ill-advised and impractical. The infrastructure needs to be improved dramatically before any development plan can be considered.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17164
<b>Full Name</b>	Philip Krajewski
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to strongly object the proposed development of Green Belt sites in and around Kings Langley. The infrastructure to cope with a development of this magnitude just does not exist.</p> <p>*the schools in the area are already oversubscribed</p> <p>*the doctors surgeries are already overworked</p> <p>*the roads are already struggling to cope with heavy traffic</p> <p>*developments over recent years have caused major parking issues (cars are parked blocking the pavement on Red Lion Lane/Nash Mills Lane 24/7. Anyone trying to get through with a pushchair or wheelchair has to walk in the road - not exactly safe !)</p> <p>*the character of the village will disappear, it will become a town</p> <p>*Wayside Farm is one of only two working Jersey herds in Hertfordshire and is a valuable asset to the local community</p> <p>*Rectory Farm is classed as an area of outstanding natural beauty, this will not be enhanced in any way by the building of houses on the site</p> <p>*the damage to wildlife and the landscape will be irreparable</p> <p>Whilst I appreciate there may be a need for new homes, I do not believe that the answer is in the development of green belt land. Please listen to the views and concerns of local residents. We are not throwing tantrums, but rather voicing real concerns for the future</p>

	of our community. The plan to more than double the size of the village is ill-advised and impractical. The infrastructure needs to be improved dramatically before any development plan can be considered.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17165
<b>Full Name</b>	Philip Krajewski
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to strongly object the proposed development of Green Belt sites in and around Kings Langley. The infrastructure to cope with a development of this magnitude just does not exist.</p> <ul style="list-style-type: none"> <li>*the schools in the area are already oversubscribed</li> <li>*the doctors surgeries are already overworked</li> <li>*the roads are already struggling to cope with heavy traffic</li> <li>*developments over recent years have caused major parking issues (cars are parked blocking the pavement on Red Lion Lane/Nash Mills Lane 24/7. Anyone trying to get through with a pushchair or wheelchair has to walk in the road - not exactly safe !)</li> <li>*the character of the village will disappear, it will become a town</li> <li>*Wayside Farm is one of only two working Jersey herds in Hertfordshire and is a valuable asset to the local community</li> <li>*Rectory Farm is classed as an area of outstanding natural beauty, this will not be enhanced in any way by the building of houses on the site</li> <li>*the damage to wildlife and the landscape will be irreparable</li> </ul> <p>Whilst I appreciate there may be a need for new homes, I do not believe that the answer is in the development of green belt land. Please listen to the views and concerns of local residents. We are not throwing tantrums, but rather voicing real concerns for the future of our community. The plan to more than double the size of the village is ill-advised and impractical. The infrastructure needs to be improved dramatically before any development plan can be considered.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17166
<b>Full Name</b>	Margaret Benson
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would wish to make the following representations regarding the proposed developments in Bovingdon.</p> <p>&gt;&gt; Additional housing in the south east is necessary but in terms of Dacorum's proposals this needs to be carefully considered alongside the 900 houses being built between Bovingdon and Chesham.</p> <p>&gt;&gt; The Chesham Road/Box Lane is regularly gridlocked and further development will exacerbate this.</p> <p>&gt;&gt; This issue along with flooding in Ley Hill Road (adjacent to Loveday's) has been reported to HCC but consistently ignored. The Green Lane proposal is particularly prone to flooding. Who is responsible for a drainage plan?</p> <p>&gt;&gt; Bovingdon Primary is an academy and as such can do what it likes in terms of its admission policy. Were it to restrict admission to Bovingdon residents, it may well be able to absorb the impact of development. They are a business and will admit those children who fit their business model regardless of where they live.</p> <p>&gt;&gt; As for GP surgeries a condition imposed on a developer would easily solve the problem of a building. Attracting the clinicians is another matter. Are you consulting health care providers?</p> <p>&gt;&gt; Are you developing a traffic management strategy? The High Street, Green Lane, Chesham Road are often quoted as being the main problems but it goes beyond that. None of the proposed developments offer anything other than further congestion and certainly offer no solutions. If it is not a condition placed on developers to incorporate Road and infrastructure improvements, then why not?</p> <p>&gt;&gt; Has Dacorum exhausted all brown field opportunities (Bovingdon brickworks?) before embarking upon an irreversible policy of destroying precious Green Belt ?</p> <p>&gt;&gt; I accept more housing is needed but short term thinking will simply lead to long term problems.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17168
<b>Full Name</b>	Helen Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes



**Your response - Please add your response here**

I am writing to state I strongly object to the proposed local planning for new homes in Bovington.

I have lived in Green Lane for the past 22 years and enjoy living in a village after moving here from Central London

The proposal BOV-h2 – land south of Homefield would include access from Green Lane.

The proposal BOV-h3 – land behind Green Lane and Louise Walk

Both of these proposals would seriously affect me, my family, those of us who live in Green lane and the village as a whole greatly.

Currently Green Lane is a busy road leading directly to the High Street. Traffic exceed the speed limit, cars are parked on the left going towards the village, by the pavement.

Only a few Sunday's ago we had a serious collision involving a car pulling out onto Green Lane and a motorbike going too fast. Both the driver of the car and motorcyclist were taken to hospital.

Currently Green Lane would not cope with an increase in traffic.

Louise Walk is not currently wide enough as a road, suggestion has been made to include a left turn only. This is really a silly irresponsible plan and would cause traffic turning at the Green to then drive down Green Lane rather than drive around the village via Green Lane onto the Hempstead Road.

This would have a negative impact on the quality of life in Green Lane. The secret lies in the name – Green Lane, its not a main road but sometimes it feels like it!

Each new home would approximately have 2 cars, so 75 new homes in Louise Walk would mean another 150 cars each day!

A proposal of 130 homes in Homefield would cause 260 additional cars in Green Lane.

Both these proposals are on Green Belt land. Once gone, Green Belt is lost forever. Currently I work in Hemel Hempstead and Watford. The journey to Hemel Hempstead is just over 4 miles and can take around 25 minutes, mainly due to heavy traffic down Box Lane, my only direct route to Hemel Hempstead. While the journey to Watford is twice the length, some 8 miles, I can do this in the same time as my journey is a delightful country drive via Chipperfield. By building new properties on Green Belt we are eroding our countryside. The very reason I moved from London to live in a village. The reason I have stayed for 22 years as I enjoy living in a village. I want our village to remain a village!

There is little work in Bovington, most villagers travel out of the village for work, such as myself to Hemel, Watford and Hatfield mainly. Traffic would increase in and out of the village as those who could afford new homes would need to travel to work elsewhere!

Parking is a well know issue in the High Street, or lack of parking. While my children were at the local Primary School it was a joy to walk with them to school and back

	<p>from Green Lane. I have a disability since a serious accident in March 2016 and can no longer walk to the village. Parking at any time can be difficult and I don't believe we have any disabled parking in the High Street.</p> <p>When I worked as a teacher at Bovingdon Primary (now Bovingdon Academy) it was one of the top 3 schools in Hertfordshire, so it was always oversubscribed. Having more families in the village I really don't know where the children would go to school?</p> <p>My children went to Hemel Hempstead Secondary School via bus as this was their closest school. This changes every few years and I believe children now go to Kings Langley School.</p> <p>A secondary school is much needed in our village.</p> <p>Last year we had severe flooding in the lower High Street, without infrastructure improvements to our village and new development would add to the possibility of further flooding. Any new developments would not be sustainable and would negatively impact the quality of life for our villagers.</p> <p>Therefore in conclusion at this time my response to this proposal is</p> <p><b>OPTION 2B – THE BEST OUTCOME FOR BOVINGDON.</b></p> <p>I choose to live in Bovingdon, I want to continue to live here.</p> <p><b>NO TO PROPOSED LOCAL PLANNING FOR BOVINGDON</b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17169
<b>Full Name</b>	Helen Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to state I strongly object to the proposed local planning for new homes in Bovingdon.</p> <p>I have lived in Green Lane for the past 22 years and enjoy living in a village after moving here from Central London.</p> <p>The proposal BOV-h2 – land south of Homefield would include access from Green Lane.</p> <p>The proposal BOV-h3 – land behind Green Lane and Louise Walk</p> <p>Both of these proposals would seriously affect me, my family, those of us who live in Green lane and the village as a whole greatly.</p> <p>Currently Green Lane is a busy road leading directly to the High Street. Traffic exceed the speed limit, cars are</p>

parked on the left going towards the village, by the pavement.

Only a few Sunday's ago we had a serious collision involving a car pulling out onto Green Lane and a motorbike going too fast. Both the driver of the car and motorcyclist were taken to hospital.

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This would have a negative impact on the quality of life in Green Lane. The secret lies in the name – Green Lane, its not a main road but sometimes it feels like it!

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A proposal of 130 homes in Homefield would cause 260 additional cars in Green Lane.

Both these proposals are on Green Belt land. Once gone, Green Belt is lost forever. Currently I work in Hemel Hempstead and Watford. The journey to Hemel Hempstead is just over 4 miles and can take around 25 minutes, mainly due to heavy traffic down Box Lane, my only direct route to Hemel Hempstead. While the journey to Watford is twice the length, some 8 miles, I can do this in the same time as my journey is a delightful country drive via Chipperfield. By building new properties on Green Belt we are eroding our countryside. The very reason I moved from London to live in a village. The reason I have stayed for 22 years as I enjoy living in a village. I want our village to remain a village!

There is little work in Bovingdon, most villagers travel out of the village for work, such as myself to Hemel, Watford and Hatfield mainly. Traffic would increase in and out of the village as those who could afford new homes would need to travel to work elsewhere!

Parking is a well know issue in the High Street, or lack of parking. While my children were at the local Primary School it was a joy to walk with them to school and back from Green Lane. I have a disability since a serious accident in March 2016 and can no longer walk to the village. Parking at any time can be difficult and I don't believe we have any disabled parking in the High Street.

When I worked as a teacher at Bovingdon Primary (now Bovingdon Academy) it was one of the top 3 schools in Hertfordshire, so it was always oversubscribed. Having more families in the village I really don't know where the children would go to school?

My children went to Hemel Hempstead Secondary School via bus as this was their closest school. This changes every few years and I believe children now go to Kings Langley School.

A secondary school is much needed in our village.

	<p>Last year we had severe flooding in the lower High Street, without infrastructure improvements to our village and new development would add to the possibility of further flooding. Any new developments would not be sustainable and would impact negatively impact the quality of life for our villagers.</p> <p>Therefore in conclusion at this time my response to this proposal is</p> <p><b>OPTION 2B – THE BEST OUTCOME FOR BOVINGDON.</b></p> <p>I choose to live in Bovingdon, I want to continue to live here.</p> <p><b>NO TO PROPOSED LOCAL PLANNING FOR BOVINGDON</b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17170
<b>Full Name</b>	Jennifer Cooper
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have been resident in New Hall Close off Bovingdon High Street for 34 years and the proposed developments are a major concern.</p> <ol style="list-style-type: none"> <li>1) Bovingdon infrastructure cannot support the proposed developments.</li> <li>2) The loss of precious green Belt, contrary to Dacorum core strategy of safeguarding the countryside.</li> <li>3) Bovingdon already has a traffic congestion and parking problem, which I experience on a daily basis. Parked vehicles block my vision (and frequently block the exit). More homes will result in increased traffic which our roads cannot cope with.</li> <li>4) Bovingdon academy is at, or close to capacity, as are doctors surgeries and dentists.</li> <li>5) The proposed developments will have a huge environmental impact. More traffic means more pollution. Pressure on drainage/sewer system would result in increased flood risk in vulnerable areas.</li> <li>6) Further development would seriously affect our already decreasing quality of village life.</li> <li>7) My preferred option for the future of Bovingdon is without doubt 2B.</li> </ol>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17172
<b>Full Name</b>	W Kneller

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to strongly voice my objection to the plans to build 450 homes in Bovingdon. This is a proposal which is impossible to understand when all of the problems that will ensue are considered . Even now Bovingdon has gradually expanded over the last 20 years to the level where it is at breaking point . It is obvious to even the most casual visitor that Bovingdon has enormous infrastructure problems especially with the traffic problems in and out of the village which at times are extremely dangerous and are a true blight on the village. Parking now is currently impossible so how the village will be able to cope with the extra traffic is unimaginable .</p> <p>Please consider the pressure on the school as well as the doctors and dentists which will not be able to cope as they are clearly at full capacity now. This is a village not a town and the destruction of the green belt will have a devastating effect on the area and will surely destroy the remaining quality of life that residents currently enjoy.</p> <p>How many areas could cope with a 25% increase in houses in what is already an overdeveloped area anyway . This is madness.</p> <p>The development will also be an environmental nightmare as traffic slowly makes its way through our congested streets while the surrounding green belt , which provides the quality of life to be expected in a village, will slowly disappear . This is an irreversible step to take. There is already a flood risk in Bovingdon and this is only going to increase the chances of making the problem worse. What sort of place is that to hand on to the next generation ?</p> <p>There are clearly more suitable sites in the area for this level of development which is understandably required but there is no need to destroy a well-loved village community by pursuing a plan on this scale which will have a dreadful and lasting outcome on the local population</p> <p>Please do not continue with these plans</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17173
<b>Full Name</b>	Ronald Basciano
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I do not object to the proposed possible new housing developments in Markyate per se as housing is needed for many people. However, I feel that after the debacle of the Hicks Road development, lessons need to be learned.</p> <p>1 What proposals are there to enhance the infrastructure to support these extra houses such as</p> <p>Sewers</p> <p>Safe access onto the A5183 for extra vehicles at the South end of the village (lights, Roundabout, etc.)</p> <p>Extra School places</p> <p>Medical facilities (Doctors' Surgery)?</p> <p>1 How will the council guarantee an acceptable pricing structure to facilitate enough social housing?</p> <p>3.What actions will the Council take to ensure the developers meet their agreed obligations even if they are taken over or go into administration leaving the residents to pick up the pieces?</p> <p>Having gone to one of your consultation evenings I was left with the distinct impression that none of the above has any serious chance of having a reasonable outcome.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17174
<b>Full Name</b>	Graham Larkbey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a frequent visitor to Kings Langley, with many friends living there, I should like to submit the following comments to this Consultation -</p> <p>a). The proposed housing growth figures are far too excessive, in effect doubling the size of Kings Langley. Indeed, this is in direct contradiction of your own proposal elsewhere in the document to reject major expansion of large villages, which is precisely what Kings Langley is. Obviously some modest expansion may be appropriate, as it is anywhere, but no hard evidence is offered regarding why such massive expansion needs to take place in Kings Langley, especially as the initial effects of the Brexit decision are already starting to reduce likely future growth requirements.</p> <p>b). There is no evidence of growing employment opportunities in Kings Langley - indeed, some industrial and office premises have already been/are being converted to residential uses - so all these new residents</p>

	<p>would have to travel elsewhere to work. Kings Langley does not have the infrastructure to support such a major increase in travel/traffic requirements - the roads in and into/out of the village are narrow and congested (the road journey into Watford is already painfully slow), the nearby M25 junction is already heavily used and prone to congestion (as is this section of the M25 itself), bus services are poor, and commuter trains are already overcrowded at peak times despite lengthening to 12 cars. Car parking at Kings Langley station would also be put under increased pressure.</p> <p>c). Local services and infrastructure - schools, doctors' surgeries etc - are already fully loaded, and the shopping centre is quite small. The latter factor would result in increased road traffic to other shopping centres.</p> <p>d). The environmental consequences of such a major expansion of Kings Langley would be catastrophic. Building over hillside areas such as Wayside Farm would blight a very attractive green belt area - again in contravention of other parts of your own document - and would greatly increase surface water run-off, resulting in an increased risk of flooding further down. Much-valued local green space, farms and amenities would be lost, and this attractive and historic village's character would be destroyed for ever.</p> <p>e). Finally, Hemel Hempstead was purpose-built as a New Town for the very purposes discussed in the document. It therefore makes much better sense to prioritise expansion in an area originally designated for that purpose, rather than ruining other locations that are completely unsuitable - of which Kings Langley is a prime example</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17176
<b>Full Name</b>	Nikki Hamilton
<b>Company / Organisation</b>	Herts & Middlesex Badger Group
<b>Position</b>	Unknown
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We feel it would be unfair to suggest that all the housing is put around Hemel and we do have considerable badger activity in the area (North, South and East) that should be taken into account (we have already advised huge concerns regarding HHH1a with its ancient woodland - Varneys Wood and also Garmer Spring/Thift Wood (ancient and mature woodland is greatly at risk in Hertfordshire) and HHH1b with its multitude of hedgerows - the impact on protected species, bio diversity and such a substantial removal of green belt - question 46);
<b>Include files</b>	

<b>Number</b>	Question 46
<b>ID</b>	LPIO17177
<b>Full Name</b>	Nikki Hamilton
<b>Company / Organisation</b>	Herts & Middlesex Badger Group
<b>Position</b>	Unknown
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We have also taken into account the amount of badger activity around Tring and feel that a 1000 homes would have a serious impact on badgers and other wildlife in the area
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17178
<b>Full Name</b>	Nikki Hamilton
<b>Company / Organisation</b>	Herts & Middlesex Badger Group
<b>Position</b>	Unknown
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	We feel it would be unfair to suggest that all the housing is put around Hemel and we do have considerable badger activity in the area (North, South and East) that should be taken into account (we have already advised huge concerns regarding HHH1a with its ancient woodland - Varneys Wood and also Garmer Spring/Thift Wood (ancient and mature woodland is greatly at risk in Hertfordshire) and HHH1b with its multitude of hedgerows - the impact on protected species, bio diversity and such a substantial removal of green belt - question 46);
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17180
<b>Full Name</b>	Chris Gregory
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I appreciate the general need for more dwellings given the pressure of an increasing population arising from



various causes. Having said this the scale of increase in the number of dwellings being proposed, I believe, is potentially very damaging to the character of the market town of Tring. I fully appreciate at this stage the sites proposed for development in Tring and elsewhere in Dacorum arise from those submitted by land owners.

The 2011 Census reveals the population of Tring Central to be 5,434 and the number of households 2,199. In this context the total number of dwellings being considered of some 2,430, albeit over a number of years, is at a level which will:

- 1 Radically alter the character of this small market town by potentially more than doubling the Tring Central population. I believe this is a relevant comparison because the proposed sites for development are relatively close to the Tring town centre and not further out in the villages.
- 2 Create unacceptable burdens on the infrastructure of the town.

Expanding on point 2 above

a. The proposed scale will impact significantly on school place provision both at Primary and Secondary level. As I understand school place availability at all levels is very tight. It is possible for Tring School (secondary school) to be extended and use the playing fields. This, however, has the effect of increasing traffic flows in and around Mortimer Hill an area already extremely busy at drop off times. The future revamping of the Sports Centre and encouraging more use by both schools in the area and the wider population will only exacerbate the traffic problem further. It will be very interesting to see what the current Traffic Impact Assessment says and how this will alter in future.

b) I see there is a proposed road to be constructed joining Station Road and Bulbourne Road. The relevance of this road escapes me as it will join one bottle neck ie Station road going over the canal to Tring Station to another series of bottle necks ie the one way bridge over the canal at Bulbourne and then the traffic light controlled bridge over the railway line near College Lake - a wild life sanctuary.

c) Station Road in the direction of Tring Station is already a busy route at peak train commuter times and in reverse in the evenings. I note with considerable concern the land for development to the north of Station Road (proposed to be 1,000 homes) will have primary access from Station Road. What will be the effect on Station Road and in addition Cow Lane? What will be the impact on the junction of Cow Lane, Station Road and Grove Road? This latter junction has been the scene of numerous car accidents over the years. Are we to see more? The other access point to this development would of course be via Marshcroft Road. This is a narrow road with a junction onto Grove Road which presumably will be come extremely busy with school traffic - Tring School and Grove Road Primary School. The approach to the junction at New Mill with Brook Street is yet another bottle neck with parked cars.

d) The front of Tring train station whether this is in the car park or in front of the ticket office is very limited for

drop off and pick ups. What will be the impact of a significant number of additional commuters? The approach roads to Tring Station are already constrained what will be the impact of additional vehicles, as no doubt a proportion of those in the new dwellings will wish to take their car to the station? Parking availability at the station now is extremely limited after 9 am and for those who wish to travel by train and cannot park their car and with limited public transport during the day what are these people to do? Will there be adequate parking provision at Tring Station? Will the capacity/frequency of the trains manage the increased numbers? Will Euston Station be able to cope given the impact of HS2 over the coming years on Euston?

e) The documents refer to providing 40% affordable housing. In the context of Tring and the general level of house prices what does "affordable" mean? Who will be able to really afford an "affordable" house and how will the developers pitch this price and at what level? Given land values, building costs and the return on investment both the land owner and builders will want to achieve how realistic is the proposition and who will benefit and who will pay?

f) The pressure on the doctors surgeries is evident now. The impact of the housing development on Western Road (which is yet to be started) we were told would be accommodated within the marginal capacity of the existing stock of doctors. At what stage will further investment in health services be made within the town when in fact they are being currently denuded ie the closure of the Health Centre on Station Road for development of further housing?

As I said at the outset some development is necessary and is, I believe, generally understood. However, the proposed scale of development would numerically swamp the town of Tring, placing unbearable pressure on the infrastructure and the quality of life of the inhabitants. The cost of putting in place the necessary infrastructure is, I believe at such a level as to be beyond the means of local government and if made to be paid by the developers, as I think it should, would most likely make the developments uneconomic. I would have thought there are other areas in Dacorum to put large such scale developments where the existing infrastructure, or with relatively minor adjustments, would make more economic sense and less overall impact.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17181
<b>Full Name</b>	Ian Stephenson
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<b>Your response - Please add your response here</b>	<p>I have lived in Berkhamsted for almost 30 years. The town has expanded quite significantly over that period with many new housing schemes proposed and developed. Dacorum is proposing far more.</p> <p>Over this 30 year period, there have been no new schools proposed let alone built. Arguably more importantly, there have been no new doctors surgeries established. Currently, from my understanding, this is approaching a crisis point where some of the doctors practices are shrinking.</p> <p>There is very little incentive to attract businesses to the town. In reality there are a couple of offices that have now been converted to retirement flats, so there is in reality a decrease in office capacity.</p> <p>So the idea of more homes on the outskirts of the town where there are no jobs in the town will require more people to travel to by car to other areas which will in reality increase the amount of traffic on the roads between the various towns around Berkhamsted.</p> <p>Dacorum is in fact promoting Berkhamsted to be a dormitory town. This is not what we are looking for.</p> <p>Please note, I am an engineer by profession and both live and have also started a very small consulting business in the town.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17182
<b>Full Name</b>	Jacqui Manton
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to object to the proposed development in Bovington of 360 homes. This is in addition to the 90 homes in the existing plan.</p> <p>As a long term resident of Bovington I have seen no improvement in infrastructure since I have been here and without any significant improvement I can't see how the village can sustain 450 homes let alone 90 homes.</p> <p>The High Street can barely cope with the amount of traffic, especially on Saturday mornings and on the school runs. The end of the High Street where the kebab shop is located can only cope at the moment with traffic coming in one direction. Vehicles regularly need to give way on this road already. Also, the turning into Old Dean is regularly very difficult to navigate, due to people irresponsibly parking on the yellow lines. You might argue that people will walk to the village but this is not the case for the vast majority of the residents who</p>

	<p>are going to work or other duties after they have visited the village to drop off children or to shop.</p> <p>From what I understand the Bovingdon Academy is at near capacity, the Secondary Schools are over subscribed and as it can be very difficult to get an appointment at the GP surgery.</p> <p>I purposely moved to the village for the relative safety and tranquility of village life and a place to bring up my family. A build of 360 houses would ruin the character of this charming village and blight the life of many of us who live there.</p> <p>Therefore my proposed option for building in Bovingdon is <b>Option 2B</b> which will have the least impact on the village and ensure it can remain sustainable.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17185
<b>Full Name</b>	Vivien Gabriel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Unless the High Street is demolished and rebuilt, it will not cope with any more traffic, and apart from that families moving into such a huge development will be cramped, and school, surgeries etc. simply will not cope. They are already stretched.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17186
<b>Full Name</b>	Rachel Heath
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have lived and worked in Dacorum for 22 years as a primary school teacher and head teacher. I am truly concerned about the number of houses and sites proposed for building housing on that has been outlined in the new local plan specifically for Berkhamsted.</p>

My concerns for the proposals are as follows:

- 1 There has already been a considerable amount of new housing in Berkhamsted which, I had hoped, was contributing to Dacorum's quota. It is unreasonable to expect Berkhamsted to do more than its fair share of development.
- 1 Building on green belt land was forbidden to protect the environment and the character of towns. The new plans suggest green belt land is no longer reserved. I would urge you to keep almost all green belt land in its original state for the benefit of the environment, the health of the community and wildlife and to reduce the loss of distinct towns.
- 1 I would be delighted if some new homes were built for our young people to afford to rent or buy. The new estate at the bottom of my road was going to offer some but they are not evident. Can the council ensure any of the new developments would have affordable housing when they have to allow the developer's a 50% share? It seems to me the developers are never challenged to follow plans properly and the council is taken for a ride.
- 1 My final concern is large as it is based on the lack of infrastructure in Berkhamsted to manage the increased population in the new homes.

We currently have challenges accessing appointments at our overwhelmed GP surgeries.

Cars park on public roads to avoid the high costs of rail car parks. Roads are congested much of the time and diabolical after a snow day! How will anybody get anywhere with the increased number of cars increased housing development brings?

My husband (school governor) and head teacher colleagues have worked tirelessly to restructure schools in the town to facilitate increased numbers of children. There will be more children with new houses. Where will they go to school?

Others will no doubt have other concerns about the collapsing infrastructure.

I therefore urge all of you to consider carefully the exact extent Berkhamsted and any of the Dacorum towns, can absorb the increased number of people living in the proposed new housing and I hope that you can drastically reduce the number of new homes built in Berkhamsted.

**Include files**

**Number**

Question 46

**ID**

LPIO17189

**Full Name**

Stella Mehew

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have already added my name to an email sent by my husband Tony Mehew and I would like to confirm that I endorse all his comments.</p> <p>In addition, I would like to make the point that it is our responsibility as citizens of a wonderful town to ensure that its nature is protected.</p> <p>I think most people would agree that towns in other counties but nearby (for example, Aylesbury and Leighton Buzzard) have lost their soul due to overdevelopment and people ask the question "where were the town fathers when these developments happened?"</p> <p>As a slight aside but a sad observation, I am reminded of the song by the Eagles called "The Last Resort" which refers to overdevelopment on the west coast of the USA and a particular line "call some place paradise and kiss it goodbye".</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17190
<b>Full Name</b>	Jon Bond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I want to register my objection to the Dacorum Local Plan which is proposing the building of an additional 1600 new homes in Berkhamsted and Northchurch in addition to the 600 homes that are currently being built.</p> <p>Over the first 10 years of the current Core Strategy Berkhamsted has <u>exceeded</u> its development targets by 34% without significant or sufficient improvements in infrastructure. In contrast, Hemel has developed at a rate some 21% <u>below</u> the target figure – a 55% net divergence. It is therefore appropriate that other areas that have not made the same contribution to development of housing stock now contribute in the same manner.</p> <p>Noting that Berkhamsted is a linear town built into a valley and suffering from significant geographical limitations the current situation is:</p>

	<ul style="list-style-type: none"> <li>• Significant car congestion during peak times – owing to the small centre of the town in a linear habitation and the increased traffic during term time to access Berkhamsted’s independent and state schools</li> <li>• extremely limited parking – both to access the local amenities and the railway station. All parking is typically full.</li> <li>• Public transport, particularly train travel, is at capacity and cannot be meaningfully increased.</li> <li>• Medical (GP, nursing and dental) facilities are at capacity and unable to serve existing demand.</li> </ul> <p>Therefore of the options put forward, Option 1B is the only one that would be acceptable and appropriate for Berkhamsted.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17192
<b>Full Name</b>	Jon Bond
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Specific comments relating to Be-h3 Land at Ivy House Lane</b></p> <p>Noting that this development on the site has previously been rejected on the following grounds:</p> <ul style="list-style-type: none"> <li>• Proximity to Chilterns AONB.</li> <li>• Strong countryside/Green Belt boundary would be breached.</li> <li>• Impact on valley sides and important dry valley location.</li> </ul> <p>I should like to make the following additional observations that lead me to conclude that development of this site is neither in accordance strategic plan nor is it a site suitable for development.</p> <p><u>Impact on Car Usage</u></p> <p>The access to the town is restricted and not capable of expansion owing the to narrow and constrained access by two narrow , single lane and poorly sighted road junctions (both the access from George Street and Bank Mill</p> <p>These accesses routes are already lined with parked cars (from existing residents) meaning that the flow of traffic is already impacted in the morning and evening rush hours. Owing to the existing traffic volumes and the road layout both accesses routes are already hazardous. For these reasons it is certainly not capable of supporting the c. 1000 additional car movements that would be a result of the building of proposed development.</p>

Access to gravel path is not a viable option owing to the fact that Meadway is a private road. Were access made to Gravel Path it the existing railway and canal bridges are already narrow bottlenecks.

Public Transport / Cycling / Walking as alternatives

Public transport cannot be used at this site. The proposed two services a day do not feed the needs of the town (given Berkhamsted contains commuters and families accessing the overcrowded schools) therefore public transport would not be a solution in any event).

The provision for walking and cycling not viable. Ivy House lane With long, very steep gradients, some of which are 1:11, cycling is cannot ben a realistic alternative form of transport. There is no dedicated cycle route near the site.

Similarly pedestrian access is challenging given the steep gradients. Further given the poor access across both the train line and the canal its is unlikely that residents would walk to and from the town on any pathway provided. Walking would certainly not be safe for increase numbers of children accessing the local schools. (please note residents have previously reported incidence of dangerous driving to the police).

Therefore there is no viable alternative to car usage which means that there would be a detrimental impact on the already existing congestion and parking problems.

Impact on Wild life and vistas

Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored

Only separated from AONB by Ivy House Lane a single-track road.

Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points.

For these reasons, of all the proposed development sites, the land at Ivy House lane is the least suitable for development.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LP1017193
<b>Full Name</b>	Sarah Fletcher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes



<p><b>Your response - Please add your response here</b></p>	<p>I strongly oppose the development of greenbelt land in Kings Langley and the surrounding areas for the following reasons;</p> <p>The approximate 3380 houses that are planned across the 4 development sites are utterly ridiculous. This would be creating a 'super town' that effectively stretches from Watford, across to St Albans and up towards Berkhamsted. This is without taking into account the the additional housing involved in the Two Waters Plans. This sprawl of housing goes against the NPPF Framework and the purposes of Green BelT;</p> <p><u>*restric sprawl &amp; merging of built up areas,</u></p> <p><u>*safeguarding countryside -</u> inc loss of working farmland (Wayside Farm)and agricultural opportunities and the character and appeal that it brings to the village</p> <p><u>*preserving historic towns</u> all character &amp; charm that have attracted residents for decades</p> <p><u>*recycling of derilict and urban land</u> Regenerating brownfield sites should be the first port of call - none have been submitted by Dacorum BC. Unused office buildings / sites in Leavesden &amp; Maylands Avenue should be considered first under this rule.</p> <p>The doctors surgeries are struggling to cope with the extra demand and Watford General will be put under even more pressure than it currently is. Emergency services already struggle with the traffic.</p> <p>The train network that services the Kings Langley &amp; Apsley area is already at breaking point - insufficient trains during the peak hours, which are crammed full (to the point where it is difficult to stand) and commuter cars, the numbers of which far outnumber the car park availability adding to the traffic congestion problems. More homes will only dramatically add to the problem. The road traffic already crawls through the area, with the approach to the M25 @ Jct 20 and the A41 through Apsley</p> <p>Although DBC have offered 9 options, they have been very sneaky by adding the Shendish Development to South Hemel Development Plan, in the hope that they can slip in under the radar yet they include the Kings Langley Developments in the Hemel Development Plan. How can this be so???</p> <p>Option <b>1A</b> is the best option of a bad bunch in my opinion.</p>
<p><b>Include files</b></p>	
<p><b>Number</b></p>	<p>Question 46</p>
<p><b>ID</b></p>	<p>LPIO17195</p>
<p><b>Full Name</b></p>	<p>Sarah Fletcher</p>
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Agent Name</b></p>	
<p><b>Company / Organisation</b></p>	
<p><b>Position</b></p>	
<p><b>Your Opinion - Please state your opinion here</b></p>	<p>Yes</p>

<b>Your response - Please add your response here</b>	Although DBC have offered 9 options, they have been very sneaky by adding the Shendish Development to South Hemel Development Plan, in the hope that they can slip in under the radar yet they include the Kings Langley Developments in the Hemel Development Plan. How can this be so???
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17225
<b>Full Name</b>	Debbie Crooks Pam Moss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>The Berkhamsted Residents Action Group (BRAG) has responded in full to the 'Issues &amp; Options' consultation. To avoid full repetition of the extensive points made in the BRAG response, I request you accept this as confirmation that I wish DBC to duplicate BRAG's responses under my name.</p> <p>However, I would like to take this opportunity emphasize just a few of the most important points within that response</p> <p>Q46 - Berkhamsted. Sites proposed for Berkhamsted suffer from similar problems/constraints, but central to the problems is the fact that Berkhamsted doesn't have the infrastructure or the capacity to improve the infrastructure to accommodate excessive growth. Berkhamsted is a small linear Market Town and the majority of sites proposed are highly visible ridge top sites, which are an anathema to the concept of sustainable development.</p> <p><b>Question 46</b> <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>This exercise is flawed. Whereas a particular site might be deemed to have and 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate <b>and</b> neighbouring area on sustainability which should be assessed.</p> <p>NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another ant to ongoing and planned developments.</p> <p>BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.</p> <p>In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an</p>

assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

~~(https://www.stalbans.gov.uk/2016/04/16/dbc-announces-review-of-green-belt-land-in-st-alban/)~~  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

**Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

**Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This

approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

##### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view

forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case



providing NO 'sustainable Prosperity' to Berkhamsted

- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the 'Potential linkages with B-h2 could be explored' – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity

- Continues 'domino effect' of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Proximity to Chilterns
  - Strong countryside/Green Belt boundary would be breached
  - Impact on valley sides and important dry valley location
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
  - Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
  - AONB currently separated from development at Hunters Park by this open agricultural area
  - Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
  - Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
  - Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction

- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
  - Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
  - No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
  - Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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to the town centre and further afield are good but usage, for any purpose, remains low.

- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - Fails to meet Dacorum or Berkhamsted Vision

- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17258
<b>Full Name</b>	Pauline McMahon
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

<p><b>Your response - Please add your response here</b></p>	<p>1 Bovingdon village is already suffering due to lack of infrastructure and services without trying to accommodate hundreds of more families. The school is full! The doctors surgeries are full! The high street is dangerously busy! There is not enough parking anywhere the village!</p> <p>1 We are an exceptionally busy village with a prison placed on its outskirts, this leads to more vehicles coming to the village to staff the prison and the constant flow of inmates visiting orders. We also have a very busy Saturday market which generates horrific amounts of traffic all day long on the Chesham road and Box Lane, this is already an issue for Bovingdon residents</p> <p>and now we have a large McCarthy &amp; Stone property being built on Box Lane which will add to the problem, and mean all those residence needed to use the village facilities.</p> <p>1 As mentioned the new retirement homes becoming available next year and several other sites in the village already earmarked for more housing - I think the village is already expanding beyond its means and there should be no more additional homes until roads and services are adequately improved.</p> <p>1 Green belt should not be built on !</p> <p>1 Drainage and sewage needs to be improved to cope with the risk to flood areas.</p> <p>1 Lastly I live on a lovely country narrow lane - which is fast becoming a dangerous rat run for vehicles wanting to avoid the village especially on Saturdays and rush hours !! The village is not easily accessed as with the recent weather conditions Box Lane is steep and led to numerous cars being abandoned as usual when we have snow! My worry is how can we rely on emergency vehicles being able to reach the village when this road is grid locked with market goes or impassable when the weather is bad!!</p>
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<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17259
<b>Full Name</b>	Karen Foxwell-Moss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	



<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to voice my concerns related to the latest proposed plan for housing development in Dacorum. Berkhamsted simply isn't big enough to accommodate the extra people and traffic that the additional homes will bring if the higher numbers of houses are accepted as 'realistic' and necessary. It is already incredibly difficult to drive through the high street and surrounding streets and to park due to volume of traffic and this will only be compounded by the proposed developments. The roads in Berkhamsted are simply not built to withstand heavy volumes of traffic. A significant part of Berkhamsted's appeal is its identity as a market town so it is important that it retains its character moving forward.</p> <p>Additionally, apart from the crippling effect the traffic will have on the high street (and the whole town), the additional residents will also need to access the already thinly spread GP surgeries and schools. Berkhamsted cannot cope with the demands that the proposed new homes will bring.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17261
<b>Full Name</b>	Leslie Steel
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>BERKHAMSTED is a market town with history, atmosphere and draws people from areas far and wide as visitors and tourists! We have a beautiful canal that instead of infilling with yet more development, we should be preventing it's destruction!</p> <p>&gt;</p> <p>&gt; Any small areas of Green Belt Land should be preserved so that we don't join up a beautiful market town with all the surrounding towns,,,, Hemel Hempstead, Tring and ultimately St Albans.</p> <p>&gt;</p> <p>&gt; We have a lot to be proud of so why are the planners trying to destroy it????</p> <p>&gt;</p> <p>&gt; We do not have the infrastructure,,,,, sufficient schools, GP practises, hospitals, water supplies or roads to cope with the massive amount of people that would be in the area if the current forecasted building development goes ahead.</p> <p>&gt;</p>

	<p>&gt; Green Belt land, not only encompasses beauty but with this brings wildlife,,, all of which will be threatened by further development!</p> <p>&gt;</p> <p>&gt; I truly hope that within the Planning Department of our current Government, someone has the foresight to halt erosion of our Green Belt and Market Town. Be rest assured, it can NEVER be replaced!</p> <p>&gt;</p> <p>&gt; I fully object to the Green Belt being released for development, which will only make Greedy Developers even richer , and destroy our community and landscape.</p> <p>&gt; I also object to the large scale of housing development which is being proposed for Berkhamsted.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17267
<b>Full Name</b>	AN Champion
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>With specific reference to site Be-h3. The review of Green Belt changes should correct a previous amendment placing the boundary between adjoining gardens.</p> <p>The GB boundary should be a well-defined and readily recognisable feature.</p>
<b>Include files</b>	<a href="#">Ivy House Lane Bullet Points</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17268
<b>Full Name</b>	Mrs Zoe Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am a Markyate resident and visited your meeting about future potential housing in our village. I live on on Hicks Rd, but not in one of the new houses. My husband and I thought it was a fantastic proposal. We visited a similar meeting and were very impressed with what was proposed. Unfortunately although the housing has</p>

	<p>improved the Rd, we are now left without the infrastructure that was promised. No new Doctors surgery, no small play area for the children, the units allocated for the shops are empty and the Rd is unfinished. I know the building company went bust but as our borough council you should be working alongside the parish council and the residents to resolve all the issues. I'm sure you are well aware of why I am mentioning this. An extra 200 houses with already congestion problems on the roads, an oversubscribed school and very poor Doctors surgery, which I am seriously thinking about leaving because they cannot offer the services I require. Poor drainage,(the high st and Hicks Rd on occasion have their sewers flood with human excrement).</p> <p>I am not opposed to new housing as I understand there is a need for housing, but the unresolved issues with Hicks Rd need to be addressed. The A5 is still a total nightmare from 7am until 9pm, coming out from either Hicks Rd or London is just simply dangerous. We were led to believe that with the new housing the junction at Hicks Rd would have traffic lights. The general flow of traffic and parking is a major issue. My children no longer go to the local school as have moved to Secondary school, which is another point. Every year Markyate parents worry about which schools our children will end up in. Our catchment is Roundwood but this is already at full capacity and causes a lot anxiety with potential parents. I could go on, but I'm sure you are well aware of the issues in our village and would like to think that you along with our parish council are working together to address this, but I fear this is not the case and totally object to the 2 developments proposed, it is totally insane to think it sensible to build 150 houses at the London Rd/a5 junction. It's an already congested area in the morning without another 200 cars leaving the village. I could go on, but regular updates from meetings leave me cold. No one at Dbc or Mpc wants to take responsibility for all the problems that occurred with Hicks Rd and you were the ones who gave planning permission.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17314
<b>Full Name</b>	Margaret and Andrew Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</b>

These are :-

1. The cumulative effect of several of several developments on the Green Belt have been ignored as have the previous recommendations of the Planning Inspectors.

2. The core strategy hierarchy states that Hemel Hempstead will be the main focus of the development as Berkhamsted and Tring have less services and facilities and are also constrained by the Chilterns AONB. In the last 10 years of the core strategy, development in Berkhamsted has been 34% above target with no increase in infrastructure, whereas Hemel Hempstead has been 21% under target.

...

- 1 Transport issues. Berkhamsted is a linear valley town with narrow streets and options are limited.

...

- 1 There is an inadequate assessment of capacity and infrastructure constraints.

8. Any additional development over and above what is already planned in Berkhamsted would be disastrous given the infrastructure constraints and current deficits i.e. water, schools, doctors and parking. Any more would ruin the historic character of the town.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to

be a deeply flawed process  
(<http://www.berkhamsted.gov.uk/development/development-control/development-control-reviews/development-control-reviews>)  
a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible "long term boundaries" and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government's continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

## **The Emerging Core Strategy states:**

### **Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

### **Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive 'green', semi-rural and suburban gateways.

### **Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of

growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

##### **Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

##### **In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site



appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251

- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a ‘sustainable and vibrant market town’
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of ‘inclusive community’
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT ‘Sustainable Travel Towns’ initiative, walking

trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states “The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car”
- Berkhamsted railway station and commuter line to Euston is already at full capacity
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway
- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO 'sustainable Prosperity' to Berkhamsted
- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution

- Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
  - Cumulative negative impact on Berkhamsted infrastructure with little contribution
  - Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
  - Increased car use and growth in level of greenhouse gas emissions
  - Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
  - Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
  - Located near A41 – noise levels and car emissions could affect health and wellbeing
  - Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
  - Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
  - Continues ‘domino effect’ of development along the ridge top that DBC was warned about
  - Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
  - Potential archaeological remains
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11,

cycling is accepted not to be a realistic alternative form of transport.

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away)

stated) and certainly no safe access for schools and children

- Poor accessibility to schools and all other facilities
  - Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
  - Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Strong countryside boundary
  - Impact on landscape/Chilterns AONB
  - Impact and visibility of development on valley sides
  - Poor relationship to town centre services and facilities, employment land and station
- 
- facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
  - Fails to meet Berkhamsted Vision
  - Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance

- Parking at Northchurch already insufficient – no capacity for additional cars from ridge top
  - Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
  - Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
  - Site falls within area of Archaeological significance
  - Adjacent to Chilterns AONB
  - Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB

- Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities
- 
- Some distance from the town centre
  - Important transition area between the town and open countryside
  - New building could set a precedent for further development of land to the A41 bypass
  - Site is too small to offer scope for additional town-wide leisure space
  - Very close to the A41
    - facilities and services not accessible
    - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- 
- Fails to meet Dacorum or Berkhamsted Vision
  - Situated at ridge top location at a distance from employment, retail, health and community services
  - Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
  - Site of archaeological significance
  - Not recommended for removal from Green Belt
  - No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few

services per day and majority of journeys would be made by car

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
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Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt



	<ul style="list-style-type: none"> <li>• Site lies within CAONB – large-scale development opportunities to be avoided</li> <li>• At a distance from immediate urban edge and would extend town further into countryside</li> <li>• Close to ancient woodland</li> <li>• Loss of leisure facility</li> <li>• Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage</li> <li>• Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch</li> <li>• Fails to meet Dacorum or Berkhamsted Vision</li> <li>• Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport</li> <li>• Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.</li> </ul>
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17315
<b>Full Name</b>	Margaret and Andrew Pike
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We wish to object most strongly to the plan to build any more dwellings in Berkhamsted and fully support all the arguments that the Berkhamsted Residents Action Group (BRAG) have put forward.</b></p> <p>3.Brownfield sites must be given priority with higher density development in Hemel Hempstead. A new</p>

properly planned garden town is possible to be developed over a number of years.

**BRAG response to Question 46 (please note full document is attached to Q46)**

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

This exercise is flawed. Whereas a particular site might be deemed to have an 'insignificant' negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. it is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most "negative but not significant" sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are 'putting the cart before the horse' in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early "partial review" which needed to include an assessment of "the role and function of the Green Belt affecting Dacorum, including long term boundaries", but the Inspector also made it clear that "more significantly" the review had to assess "the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum."

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although 'parking' the issue of St Alban's proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process

(~~as was demonstrated by the DBC's Green Belt Review of Dacorum~~ a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out 'blind' of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with

developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

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 likely to mean quite the opposite with increased congestion, reduction in commercial viability of 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

**The Emerging Core Strategy states:**

**Built Character**

- The open valley sides would be particularly sensitive to the effects of new development
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density

**Key views**

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

**Berkhamsted Vision**

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

#### **Looking after the Environment**

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

#### **Social and personal welfare**

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

#### **Economic prosperity**

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

#### **Comments on individual sites**

##### **Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary
- Development would be highly visible from this prominent ridge top location
- Erosion of buffer between bypass and existing built up area
- Poor relationship to town centre services and facilities, employment land and station
- Important transition area between the town and open countryside would be damaged
- This could also set a precedent for further development of land southwards to the A41
- Not well related to existing housing
- Visual impact on important gateway to town from A416 and A41
- Proximity of A41 bypass
- Potential impact on the setting of Ashlyn's Hall

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- The loss of productive farm land
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed,

especially given cumulative impact of existing and other promoted development.

Sustainability Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will

have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.

- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the

likelihood that a high proportion will commute to work or make their journey to the station by private car”

- Berkhamsted railway station and commuter line to Euston is already at full capacity
  - Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
  - Suggestion of local employment opportunities in ‘local centre’ or business units – generate more car journeys – not viable anyway
  - GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
  - Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
  - Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
  - Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution
  - Suggestions of managed woodland doubtful – who would have responsibility
  - Area of Archaeological significance affects part of the land
  - Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more
- 
- Site is insufficient on its own, but could be phased with other land
  - Site is part of the open transition area between the town and the wider countryside
  - New building could set a precedent for further development of land southwards to the A41
  - Site is too small to offer scope for additional town-wide leisure space
- 
- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult



- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues 'domino effect' of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Proximity to Chilterns
- Strong countryside/Green Belt boundary would be breached
- Impact on valley sides and important dry valley location
- facilities and services not accessible

- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAC's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site

- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Strong countryside boundary
- Impact on landscape/Chilterns AONB
- Impact and visibility of development on valley sides
- Poor relationship to town centre services and facilities, employment land and station
- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Fails to meet Berkhamsted Vision
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of 'bus loop' therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB

- Suggestion of potential new primary school – not part of Berkhamsted education policy
  - Lack of secondary school capacity – Ashlyns School
  - Same arguments on accessible housing – distance from facilities and services
  - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
  - Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- 
- Site is insufficient on its own, but could be phased with other land
  - Some distance from the town centre
  - Next to the Chilterns AONB
  - Site is too small to offer scope for additional town-wide leisure space
  - The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities
  - Visually prominent site
  - Proximity to railway line
  - Impact on setting of the canal
- 
- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
  - Close to Northchurch AQMA
  - Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
  - Parking difficulties and concerns for safety of children attending St Mary's School – recent death of nine year old girl in road accident
  - Noise from railway
  - Distance from town centre services and vital facilities

- Some distance from the town centre
- Important transition area between the town and open countryside
- New building could set a precedent for further development of land to the A41 bypass
- Site is too small to offer scope for additional town-wide leisure space
- Very close to the A41
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Situated at ridge top location at a distance from employment, retail, health and community services
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

Encroachment of the urban area along the valley bottom and into adjoining open countryside

- Distance from the town centre services and facilities, employment land and station
- Impact on setting of the River Bulbourne
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person's accommodation on site – at a distance from the town centre facilities and services - residents won't be walking and cycling to the town

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

- facilities and services not accessible
- Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to

	Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
<b>Include files</b>	<a href="#">BRAG response to Issues Options.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17323
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17370
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>There is no evidence that there has been adequate consideration of the infrastructure needed to support the construction of the higher number of homes proposed. Specifically access to the town from those sites on the Eastern boundary between Cow Lane/Station Road and Bulbourne Road but also from those sites to the A41. Additionally there has been no consideration of the impact on the existing infrastructure further from Tring. The volume of traffic using the A41 is significant. Add to the current traffic volumes the vehicles that will come with the current significant development in Aylesbury and then lay on top of that the vehicles will associated with the additional properties in Tring and it quickly becomes unsustainable. Are we going to have to end up with a 6 lane A41 to cope? I am concerned that the appropriate council responsible for the maintenance of the existing road network simply won't be able to cope with the additional roads and increased traffic volumes on existing roads given recent history</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p>



	The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO17371
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>The development on sites TR-H1 to TR-H3 effectively creates another settlement to the East of Tring. The location is too far out of the centre of Tring with its shops and other services to be able to easily access the town. I do not believe that it will feel part of the market town which has limited physical infrastructure. The High Street and Western Road is small with limited parking, served by a limited range of shops. Accommodating all these additional homes is going to put a significant pressure on those services together with schools, medical services and transport. I do not see that it is in anyway achievable or sustainable without massive coordinated expenditure and joint up thinking with adjoining local authority areas. One only has to walk the ridge above Aldbury Nowers to see the impact development in TR -H1 to TR- H3 would have on the landscape.</p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>Question 46. Do you have any feedback on any of the sites contained in the draft schedule of site appraisals or the sustainability appraisal working out which accompanies it?</p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has</p>

failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic*

levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities

should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations</i>..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p>24 See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD 105.</p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO17372
Full Name	Mr David Parker
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>There are better places such as Hemel Hempstead within the borough in which the proposed expansion can and should be accommodated.</p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>Question 46. Do you have any feedback on any of the sites contained in the draft schedule of site appraisals or the sustainability appraisal working out which accompanies it?</p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide</p>

"...about 2500 new homes and 55ha of new employment land..." and that the DBC:

"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion



In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- *Ibid*, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North

of Station Road

Agricultural

Grade 2  
TR-H2  
Land West of Marshcroft Lane  
Agricultural  
Grade 2  
TR-H3  
Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural  
Grade 2  
TR-H4  
Land at Cow Lane  
/ Station Road  
Maintained Open Land  
Grade 2  
TR-H5  
Land at Dunsley Farm, London  
Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

24 See *House of Lords in Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle

	<i>is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17373
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>6. We have not made sufficient use of existing brownfield sites in Tring where I believe most of the additional housing beyond the currently allocated numbers (which still have to be built to the SW of the town) can be accommodated. We should not move to build on precious high quality green belt land adjacent to areas of outstanding natural beauty with having fully exhausted existing brownfield sites and then, and only if proven necessary, to use the land to the south and north of the town which is much less sensitive green belt than that to the Eastern side. To do otherwise would cause significant harm to the surrounding countryside and how the settlements sits within the landscape.</p> <p>7. Any development must be of high quality homes the vast majority of which has to be affordable. Development must be mixed with appropriate commercial premise.</p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>Question 46. Do you have any feedback on any of the sites contained in the draft schedule of site appraisals or the sustainability appraisal working out which accompanies it?</p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p>

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Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." *(Emphasis added)*

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- Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road  
Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane  
Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

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Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

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The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

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LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations*..." 24 and make a rational decision based upon its own

	<p>"Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17374
<b>Full Name</b>	Mr David Parker
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>As a member of the Grove Fields Residents Association (GFRA) and a resident of Grove Road, Tring I attach the response prepared by the planning consultant appointed by the GRFA.</b></p> <p>There is no evidence that there has been adequate consideration of the infrastructure needed to support the construction of the higher number of homes proposed. Specifically access to the town from those sites on the Eastern boundary between Cow Lane/Station Road and Bulbourne Road but also from those sites to the A41. Additionally there has been no consideration of the impact on the existing infrastructure further from Tring. The volume of traffic using the A41 is significant. Add to the current traffic volumes the vehicles that will come with the current significant development in Aylesbury and then lay on top of that the vehicles will associated with the additional properties in Tring and it quickly becomes unsustainable. Are we going to have to end up with a 6 lane A41 to cope? I am concerned that the appropriate council responsible for the maintenance of the existing road network simply won't be able to cope with the additional roads and increased traffic volumes on existing roads given recent history</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has</p>

failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic*

levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities

should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.



	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations...</i>"<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17422
<b>Full Name</b>	Lesley Brown
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.</p> <p>Q.46 – Sites Yes Berkhamsted</p> <p>I would like you to take the following points into consideration when you determine what future housing plans should be put in place for Dacorum. Dacorum in itself is a massive conurbation, the major town being Hemel Hempstead, with smaller towns and villages forming Dacorum. The Borough is quite diverse and this is what makes the Borough unique and not just "the same". If you build even more housing in Berkhamsted the uniqueness and diversity of the area will disappear.</p> <p>&gt; The town of Berkhamsted is described in the Hertfordshire County review of it's market towns as a town of exceptional character and of historic interest being a quiet town despite it's commuter location. I believe the proposals as described will be to the detriment of the town.</p> <p>&gt; The reasons for this are as follows:</p> <p>&gt; - the town is built around a steep sided valley which is already jammed with local traffic, despite the A41 by-pass. At times the High St and surrounding roads become gridlocked and it can regularly take 45mins to 60mins to travel from Northchurch to Bourne End. More</p>

housing on the scale proposed will only add to this situation.

> - Berkhamsted is being over developed with 34% more houses than the current target where as Hemel Hempstead is 21% below it's building target. This in my opinion is an unfair allocation of housing.

> - The whole infrastructure of Berkhamsted cannot cope with an increase in population as proposed. There are insufficient services to meet the needs - health, education, road systems, public transport etc of the existing population let alone that envisaged in the Local Plan. Hemel Hempstead is better able to cope with such an increase being a much newer town and with more up to date and expandable conditions.

> - There is a lack of public transport which results in an increase in the use of cars etc. The hilly nature of the town means that the use of bikes is not practical for the majority of the population of the town especially looking at its demography.

> The consequence of this is that there is a woeful lack of parking in the town. The proposed multi-storey car park will not even meet the needs of the existing population let alone the proposed increase. The consequence of this congestion will be to drive local businesses out of the town and discourage new ones from setting up.

> The additional traffic can only lead to an increase in pollution with the subsequent health risks linked to that. The town is currently poorly serviced by Herts CC and suffers as a result of this. For example in the current bad weather problems experienced from 10th December onwards there has hardly been a gritting lorry in the town and important side roads serving schools, doctors etc and bus routes have not been gritted at all. Appalling service which will be made worse as the number of houses increase.

> The school provision will not accommodate the proposed increases.

> The health provision is totally inadequate. With the withdrawal of Hemel Hempstead hospital from service the provision has become one of the worst in the country. How can a Local Plan be predicated on the use of Watford Hospital to service our population which is predicted to increase by thousands. It does not make sense.

> Similarly the maternity hospital will be too far away to provide the provision that should be provided to mothers and children.

> The provision for the elderly is similarly inadequate with very poor provision in the town. The closure of the Gossoms End Elderly Care unit and the support it offered to the community is symptomatic of the lack of provision. This situation will only be exacerbated by the proposed additional housing proposals in the plan. Not all new householders will be young commuting families.

> Local doctor surgeries are already struggling to meet the needs of the current population. Nearly all of the surgeries in town are housed in non purpose built properties within the narrow road network in the town

and all have inadequate car parking facilities and are not directly on bus routes. The Local Plan will only make this situation worse even if a new practice surgery is proposed within the developments.

> Finally, I fully support the responses to the Local Plan as submitted by the Berkhamsted Citizens Association and the Dacorum Health Action Group both of which I have fully read.

> As a consequence Option 1B to develop Hemel Hempstead with its better infrastructure being a new town designed for expansion is the better option. Berkhamsted being a market town is ill equipped for the expansion outlined.

Berkhamsted Citizens Association response to question 46 below (copy of full response attached)

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

	<p>providing green space and their contribution to ecological development and biodiversity. Many biodiversity corridors run through private gardens.</p> <p>. <b>BIODIVERSITY</b></p> <p>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.</p> <p>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</p> <p>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.</p> <p>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.</p> <p><a href="http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/">http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/</a></p>
<b>Include files</b>	<a href="#">Berkhamsted Citizens Response (DBC Strategic Plan).pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17430
<b>Full Name</b>	Sara Bell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes



<p><b>Your response - Please add your response here</b></p>	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p>Tring is a historic market town that is already being disfigured by new housing developments that are totally not in-keeping with the look and feel of the town. The flat development on Wingrave Road is a perfect example.</p> <p>Along with the proposed housing development along Icknield Way, your proposed development of Grove Fields is on greenfield land which is dearly valued by many members of the community. It offers a meeting place for community members, a place for children to play, a place for dog walkers and a place for nature. You plan to remove one of the last green park spaces in Tring.</p> <p>As above, Tring is a market town that does not have the infrastructure to accommodate an influx of residents that your proposed development would attract. Road congestion is an issue, so are nursery/school spaces, parking, doctor/dentist availability. I could go on....</p> <p>I hope you hear and take into consideration the voices of Tring community members.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<p><b>Include files</b></p>	<p><a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a></p>
<p><b>Number</b></p>	<p>Question 46</p>
<p><b>ID</b></p>	<p>LPIO17473</p>
<p><b>Full Name</b></p>	<p>Caroline Horan</p>
<p><b>Company / Organisation</b></p>	<p></p>
<p><b>Position</b></p>	<p></p>
<p><b>Agent Name</b></p>	<p></p>
<p><b>Company / Organisation</b></p>	<p></p>
<p><b>Position</b></p>	<p></p>

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I wish to register my opposition to the DBC Local Plan Issues. The plans as I understand them will completely destroy the historic character of this small market town which at present is bordered by countryside. In addition, despite the potential (unconfirmed) infrastructure that might go with the planned development, I can only see increased traffic congestion in the town, which is already blighted by traffic jams and lack of safe parking opportunities.
Include files	
Number	Question 46
ID	LPIO17478
Full Name	Sara Bell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p>Tring is a historic market town that is already being disfigured by new housing developments that are totally not in-keeping with the look and feel of the town. The flat development on Wingrave Road is a perfect example.</p> <p>Along with the proposed housing development along Icknield Way, your proposed development of Grove Fields is on greenfield land which is dearly valued by many members of the community. It offers a meeting place for community members, a place for children to play, a place for dog walkers and a place for nature. You plan to remove one of the last green park spaces in Tring.</p> <p>As above, Tring is a market town that does not have the infrastructure to accommodate an influx of residents that your proposed development would attract. Road congestion is an issue, so are nursery/school spaces, parking, doctor/dentist availability. I could go on....</p> <p>I hope you hear and take into consideration the voices of Tring community members.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same,</p>

	<p>set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17480
<b>Full Name</b>	Sara Bell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I believe you have already received the attached from planning consultants on behalf of the Grove Fields Residents Association. As a community member strongly opposed to the suggested development, I felt it necessary to re-send the report with my own comments on the matter.</p> <p>Tring is a historic market town that is already being disfigured by new housing developments that are totally not in-keeping with the look and feel of the town. The flat development on Wingrave Road is a perfect example.</p>

Along with the proposed housing development along Icknield Way, your proposed development of Grove Fields is on greenfield land which is dearly valued by many members of the community. It offers a meeting place for community members, a place for children to play, a place for dog walkers and a place for nature. You plan to remove one of the last green park spaces in Tring.

As above, Tring is a market town that does not have the infrastructure to accommodate an influx of residents that your proposed development would attract. Road congestion is an issue, so are nursery/school spaces, parking, doctor/dentist availability. I could go on....

I hope you hear and take into consideration the voices of Tring community members.

**GFRA Response to Question 46, full document attached to question 46**

We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "Stage 2 Green Belt Review and Landscape Appraisal – Report" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999]
  - Ibid, 17

#### ALC Conclusions Table

#### **SSA Site Reference**

#### **Location**

#### **Use**

#### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an



over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations*..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17481
<b>Full Name</b>	Martin Hillier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	

<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to add my voice to the great number of council tax payees who have voiced their objections to the plans for Berkhamsted. This is a similar letter to that which my wife has sent to you as our views are very similar, punctuated by some of my own thoughts.</p> <p>Yesterday, in the aftermath of the snow storm, we saw the town virtually deadlocked – in all the major arteries in and out of the town – both the longitudinal and lateral roads. All the other services the town must provide.</p> <p>The question arises how on earth can Berkhamsted cope with an increase of 25,000 houses and the natural increase in the number of residents with the demand for the services which must be provided.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17489
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p>Please find attached a report about the proposed development of Tring. Many residents of Tring are against this development &amp; are genuinely concerned about the impact it will have on Tring. Carparks, Schools, Doctors &amp; Dentists are already under too much pressure &amp; could not cope with or accommodate a larger population! To get a doctors appointment you already have to have 2-3 weeks! You cannot find spaces in the car parks at the weekend or at peak times when everyone needs to shop and one of the local schools has also had to add another classroom to accommodate the growing population but now that's done there literally isn't a school that can accommodate more.</p> <p>The attached document is also very closely aligned with that of Tring Town Council.</p> <p><b>I hope you will look at this report very closely.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p>

	<p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17536
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p>Please find attached a report about the proposed development of Tring. Many residents of Tring are against this development &amp; are genuinely concerned about the impact it will have on Tring. Carparks, Schools, Doctors &amp; Dentists are already under too much pressure &amp; could not cope with or accommodate a larger population! To get a doctors appointment you already have to have 2-3 weeks! You cannot find spaces in the car parks at the weekend or at peak times when everyone needs to shop and one of the local schools has also had to add another classroom to accommodate the growing population but now that's done there literally isn't a school that can accommodate more.</p> <p>The attached document is also very closely aligned with that of Tring Town Council.</p> <p>I hope you will look at this report very closely.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u><a href="#">Principal Contention</a></u></p>

	<p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17538
<b>Full Name</b>	Emma Talbot
<b>Company / Organisation</b>	The Little Cloth Rabbit
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a report (GFRA) about the proposed development of Tring.</b></p> <p>Please find attached a report about the proposed development of Tring. Many residents of Tring are against this development &amp; are genuinely concerned about the impact it will have on Tring. Carparks, Schools, Doctors &amp; Dentists are already under too much pressure &amp; could not cope with or accommodate a larger population! To get a doctors appointment you already have to have 2-3 weeks! You cannot find spaces in the car parks at the weekend or at peak times when everyone needs to shop and one of the local schools has also had to add another classroom to accommodate the growing population but now that's done there literally isn't a school that can accommodate more.</p>

The attached document is also very closely aligned with that of Tring Town Council.

I hope you will look at this report very closely

**GFRA Response to Question 46, full document attached to question 46**

We have analysed the DBC's "Evidence Base" documentation and provide our "*feedback*" regarding the sites contained in the "*draft schedule of site appraisals*" and the "*sustainability appraisal*" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "*...about 2500 new homes and 55ha of new employment land...*" and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "*...exceptional circumstance...*" in accordance with the NPPF to "*...justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "*...exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "*...Green Belt's five purposes...*"

as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- *Ibid*, 17

ALC Conclusions Table

**SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural  
Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural  
Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural  
Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land  
Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." *(Emphasis added)*

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." *20 (Emphasis added)*

*19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment



TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would

	<p>provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.</p> <p><u>Conclusion</u></p> <p>In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating <b>TR-H5</b> and <b>TR-H6</b> would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.</p> <p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations</i>..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p>24 See House of Lords in <i>Anisminic v Foreign Compensation Commission</i> [1969] AC 147 - the principle is more simply enunciated by Lightman J in <i>R v Director General of Telecommunications, ex parte Cellcom Ltd</i> [1999] COD 105.</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17583
<b>Full Name</b>	Mr Garry Lilburn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my objections to the strategic plans of building on any green belt areas within Dacorum. If building is necessary it should only be confined to the towns and should not lead to villages being increased in size.</p> <p>My reasons are that I chose to live in Kings Langley as it was a village. I enjoyed that when you approached the village you came through green belt areas such as by the Hillside Farm and that when I went for a walk I had a short walk before I was in the countryside.</p> <p>The character of the village is why I chose to live here and to increase its size, allowing the village to join up with other areas will lose the current identity of the village and will lose its character. Village life should be exactly that. Any proposals to increase the size of the village</p>

	<p>would make it like a small town rather than a village and this should be opposed.</p> <p>The joining up of areas i.e. using up green areas for building will lose Kings Langley's character of a village atmosphere, green spaces close to the village centre, as sense of community which towns do not offer. This is the reasons why so many people live here and to change that character through the coalescence with other areas should be opposed and I object to any building in this area for that reason.</p> <p>I would also state that building in Shendish is NOT Hemel Hempstead despite the postcode but is very much part of Kings Langley. Allowing Kings Langley to be swallowed up to Hemel Hempstead in this manner who be terrible for Kings Langley and particularly its character as a village.</p> <p>I also do not think that the arterial roads or services could cope with such developments but I appreciate that this may not hold sway with your design making. I do however think that making the severely congested roads even more congested would affect the character of the village. To have a High Street completely blocked by traffic queuing to join the M25 or queuing to enter the village High Street from the M25 will ruin the character too: eating/drinking in the High Street will be very unpopular and the sense that the High Street is the centre of the village will be eroded if it cannot be reached due to weight of traffic twice a day.</p> <p>In summary, I object to building in Kings Langley and favour the options of increasing the Dacorum towns but not to the detriment of neighbouring villages.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17584
<b>Full Name</b>	Mr Garry Lilburn
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	I would also state that building in Shendish is NOT Hemel Hempstead despite the postcode but is very much part of Kings Langley. Allowing Kings Langley to be swallowed up to Hemel Hempstead in this manner who be terrible for Kings Langley and particularly its character as a village.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17596
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning &amp; Development details my concerns comprehensively.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17643
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036.</p> <p>The attached report by Next Phase Planning &amp; Development details my concerns comprehensively. I believe that the case for the number of new dwellings being proposed for Tring has not been made and that further work is required to establish the sites to be used for any new developments. In this regard, I am concerned that green belt sites are being considered before the availability and suitability of any and all brown</p>

field sites have been assessed. The green belt land surrounding Tring is critical to the character of the town but once it's gone, it's gone.

...

I urge you to consider and communicate all options thoroughly please before decisions are taken which will be regretted by Tring residents for generations to come.

**GFRA Response to Question 46, full document attached to question 46**

We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17645
<b>Full Name</b>	Paul Hembury
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>I am writing to express my concern over the proposed development of Tring as set out in the Issues and Options Consultation Local Plan to 2036. The attached report (GFRA) by Next Phase Planning &amp; Development details my concerns comprehensively.</b></p> <p>I believe that the case for the number of new dwellings being proposed for Tring has not been made and that further work is required to establish the sites to be used for any new developments. In this regard, I am concerned that green belt sites are being considered before the availability and suitability of any and all brown field sites have been assessed. The green belt land surrounding Tring is critical to the character of the town but once it's gone, it's gone.</p> <p>I urge you communicate all options thoroughly please before decisions are taken which will be regretted by Tring residents for generations to come.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "<i>...about 2500 new homes and 55ha of new employment land...</i>" and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved...</i></p> <p><i>This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt</p>

surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...*national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above,

therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane



/ Station Road  
Maintained Open Land  
Grade 2  
TR-H5  
Land at Dunsley Farm, London  
Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." <sup>20</sup> (*Emphasis added*)

*19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to

the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other

sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...*relevant considerations*..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17649
<b>Full Name</b>	Guinness Partnership
<b>Company / Organisation</b>	Guinness Partnership

<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Green belt reviews, when undertaken, should take a long-term (25 year) view. The Green Belt review undertaken by Arup and published in 2016 is fundamentally flawed in looking to see if Green Belt can be released in any locations, and doubly flawed in suggesting that settlements such as Markyate be 'girdled' with Green Belt to:</p> <ol style="list-style-type: none"> <li>1 prevent its further expansion, and</li> <li>2 avoid coalescence with Slip End and Caddington</li> </ol> <p>Both of these settlements are to the north-east of Markyate and therefore adding Green Belt to the north-west is totally ineffectual in this respect.</p> <p>The Arup plan suggests that a 6-hectare development be promoted at Markyate, within the Green Belt on land subject to the AONB designation (<b>see Appendix 4</b>). It would be more appropriate to develop close to the school, not 1500m away.</p> <p>In the Arup report, they produce map 6.1 showing areas for possible Green Belt expansion around Markyate. Area RA.A2 is exactly the location that should be considered for expansion of the town, as it is close to the village school and within easy walking distance of the shops. It would be madness to add this to the Green Belt.</p> <p>As the Local Plan states, apart from the major settlements, virtually the whole of Dacorum District is covered by either Green Belt or AONB. That being the case, there is no option other than to undertake the long-term review of Green Belt boundaries around main settlements with a view to accommodating approximately 25,000 houses within these Green Belt releases.</p> <p>A sea change in housing delivery cannot be delivered close to London unless substantial areas are removed from the Green Belt on the periphery of sustainable settlements. Major growth should be directed to where there are rail links – hence Hemel Hempstead, Berkhamsted and Tring – but a settlement such as Markyate could accommodate say 300-400 houses west of the A5 inside and outside the Green Belt. Indeed, Arup have already suggested an allocation to the south of Markyate. It is totally illogical to recommend a Green Belt site over the north-western corner of the settlement which is not Green Belt.</p>
<b>Include files</b>	

Number	Question 46
ID	LPIO17659
Full Name	Guinness Partnership
Company / Organisation	Guinness Partnership
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>From:</b> Edward Keymer [mailto:edward.keymer@keymer-cavendish.co.uk]</p> <p><b>Sent:</b> 8 December, 2017 2:47 PM</p> <p><b>To:</b> 'Andrea Gilmour' &lt;Andrea.Gilmour@hertfordshire.gov.uk&gt;</p> <p><b>Cc:</b> 'DGEL' &lt;dgelacon@btinternet.com&gt;</p> <p><b>Subject:</b> Site at Markyate</p> <p>Dear Andrea Gilmour</p> <p><i>Following our telephone discussion this morning, I attach plans upon which my client's 3.5 hectare site ( c.100dw) is outlined in red. Please ignore the sites outlined in blue.</i></p> <p><i>I also attach photographs showing access to the site (see <b>Appendix 3 – also see photos of site</b>). (note all appendicies referred to are collated into one appendix attached )</i></p> <p><i>You will see that this site is immediately adjacent to the Markyate village school which we understand is about to be expanded from 1FE to 1.5FE. I imagine it would be more efficient for this school to run at 2FE, if it has the space on site to do so.</i></p> <p><i>Access to my client's site can be taken either:</i></p> <ol style="list-style-type: none"> <li><i>1 In front of the school via Cavendish Road - but this road may be heavily congested</i></li> <li><i>2 From Buckwood Road - but sight lines and road width are impeded at the junction with the High Street by an HCC fire station. This could be relocated on to our client's site and it is likely that the fire station site itself could be redeveloped with sheltered housing in a form which optimises the value of the site whilst providing appropriate highways width and visibility. This would involve negotiation with the County Council.</i></li> </ol> <p><i>You will see on the plan headed Buckwood Road Improvements</i></p> <p><b>[see Appendix 2] (note all appendicies referred to are collated into one appendix attached )</b> that HCC appear to own a substantial site around the fire station which would yield significant value for sheltered housing. Indeed, it might even fund the construction of a new fire station. You will also see that I have suggested utilising highway verge to increase car parking on Buckwood Road.</p>

*I would be most grateful if you could pass this email to appropriate colleagues dealing with schools, highways and fire stations.*

*With many thanks in anticipation for your help.*

**Edward Keymer FRICS**

**Keymer Cavendish Ltd – Planning & Development Consultants**

#### **Access and Education**

In short, Keymer Cavendish and the landowners will work with HCC for joined-up thinking in education and access.

Primary schools generally run most economically at 2FE level, if there are the pupils to sustain this size of school. There are already plans afoot to enlarge the school to 1.5FE. The text below is from the School website

*Markyate Village School and Nursery serves the village of Markyate which is situated close to St. Albans. We are currently a single form entry school, but we are growing fast and will soon become a one and a half form entry school with mixed age classes throughout.*

*Since September 2015 we have taken 45 children into Reception. We have a combined Foundation Stage for Nursery and Reception. Every class has a spacious classroom, often with an adjoining area for working on projects requiring more space or for small groups to work in with additional support. Every class has access to outdoor learning space and our new outdoor classroom, our Sunshine Room.*

Increasing the number of pupils within the walk-in catchment will reduce traffic congestion and hence the carbon footprint. Adding new homes 1500m distant in the Green Belt will do the opposite, as few pupils will walk to school. That is also true of any new housing is allocated west of the A5183.

#### **Future Action**

Consideration should also be given to allocating a larger site NW of Markyate Primary School, screened by appropriate landscaping. Access might be taken from the A5183 north of Manor Farm (**see Appendix 1**).

**- (note all appendices referred to are collated into one appendix attached )**

However, in the meantime, my client's site north of Buckwood Road should proceed with an early planning application for c.100 homes with landscaping, in concert with HCC. This might just involve redeveloping the fire station, or if the school site requires modest expansion, terms may be agreed in this respect.

As the emerging Local Plan suggests, Markyate is the right settlement to take some growth, but the most sustainable location is in the AONB close to the village school.

<b>Include files</b>	<a href="#">Guinness Partnership / Keymer-Cavendish - All Appendices Document.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17670

Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</b></p> <p>We have been living in Tring for over fifty-five years and are dismayed by the size of the proposed housing development, which would completely change the character of our town. It would significantly increase the 'Dormitory' population, because there is no way that the existing industry could provide employment for the hugely increased population that this sized development would bring.</p> <p>The Schools, the Doctors Surgeries, the Tring Centre &amp; Station Car Parks are already inadequate for the existing population's needs.</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached to question 46</b></p>
Include files	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
Number	Question 46
ID	LPIO17717
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</b></p> <p>We have been living in Tring for over fifty-five years and are dismayed by the size of the proposed housing development, which would completely change the character of our town. It would significantly increase the 'Dormitory' population, because there is no way that the existing industry could provide employment for the hugely increased population that this sized development would bring.</p> <p>The Schools, the Doctors Surgeries, the Tring Centre &amp; Station Car Parks are already inadequate for the existing population's needs.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>



Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO17719
Full Name	Michael and Jill Sanders
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>As Members of the Grove Fields Action Group we have commissioned the attached report, at great expense, which indicates how strongly we feel about these proposals. This report sets out in great detail our concerns, far more eloquently than we could do ourselves.</b></p> <p>We have been living in Tring for over fifty-five years and are dismayed by the size of the proposed housing development, which would completely change the character of our town. It would significantly increase the 'Dormitory' population, because there is no way that the existing industry could provide employment for the hugely increased population that this sized development would bring.</p> <p>The Schools, the Doctors Surgeries, the Tring Centre &amp; Station Car Parks are already inadequate for the existing population's needs</p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p>

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... *[however]* ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant*

*consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.

18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England,

2014, *An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")*.

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "*High...Medium...[or]...Low*" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "*Green Belt Parcel Numbers*", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "*...of poorer quality...*"; and

LS Conclusions: TR-H1 should be "*excluded*" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO17766
Full Name	Diana Woodward
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I have read the submissions made to you by the Berkhamsted Citizens Association and the Labour Party, and would like to endorse the views they express. I live in Wigginton, equidistant between Tring and Berkhamsted.</p> <p>My main concerns echo those made by BCA:</p> <ul style="list-style-type: none"> <li>• the need to protect the Green Belt and the character of the AONB from development where alternative sites exist.</li> <li>• the creaking infrastructure, which cannot handle more population growth without major investment, especially in Berkhamsted. The BCA submission mentions transport and traffic congestion, parking, school places and health care provision. I endorse their concerns. I can't see any mention of broadband provision in their submission; my perception is that the new houses on Shootersway have reduced our broadband speeds (as we are further away from the 'green box' near M&amp;S) to about 2 mps, which is too little to be able to use the internet for anything other than basic e-mails. This is unacceptable and set to worsen if more houses are built.</li> </ul> <p>BCA response to Question 46 below - full document attached</p> <p><b><i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></b></p> <p><b>Yes</b></p> <p><b>General Comment:</b></p> <p>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.....</p> <p>Proposed Approaches are set out – and then ignored in the selection of sites for development</p>

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 backdrop 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.

#### . 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

	<p>9000 car movements a day which will probably use Berkhamsted Railway station and shopping area.</p> <p>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.</p> <p><a href="http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/">http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/</a></p>
<b>Include files</b>	<a href="#">Berkhamsted Citizens Response (DBC Strategic Plan).pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17775
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p>1 To the extent that there is a requirement to build additional homes in Dacorum, they should be focussed primarily in Hemel Hempstead which is a town that has ben developed with the infrastructure to support a much larger community</p> <p><b>Q46 – Hemel Hempstead (Yes)</b></p> <p>To the extent that additional homes beyond the 500 or so already planned for Tring are required to satisfy the Government targets, then the Dunsley Farm site is the most logical site to develop given that it is close to the centre of Tring and therefore would not extend the current boundariesIf additional houses are to be built in Tring, thought needs to be given to enhancing the infrastructure generally and also increasing local job opportunities, for example through a new business park in the town</p> <p>The possible development of the Grove Fields sites under allocations TR-H1, TR-H2 and TR-H3 would increase the geographical area of the town significantly in a direction well away from the town centre, fundamentally changing the overall characteristics of the town</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p>

	<p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached to question 46</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LP1017822
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p>To the extent that there is a requirement to build additional homes in Dacorum, they should be focussed primarily in Hemel Hempstead which is a town that has ben developed with the infrastructure to support a much larger community</p> <ol style="list-style-type: none"> <li>1 To the extent that additional homes beyond the 500 or so already planned for Tring are required to satisfy the Government targets, then the Dunsley Farm site is the most logical site to develop given that it is close to the centre of Tring and therefore would not extend the current boundaries</li> <li>2 If additional houses are to be built in Tring, thought needs to be given to enhancing the infrastructure generally and also increasing local job opportunities, for example through a new business park in the town</li> </ol> <p>The possible development of the Grove Fields sites under allocations TR-H1, TR-H2 and TR-H3 would increase the geographical area of the town significantly in a direction well away from the town centre, fundamentally changing the overall characteristics of the town</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site</i></p>

	<p><i>appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</i></p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17824
<b>Full Name</b>	John and Helen Osborne
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p>4.To the extent that additional homes beyond the 500 or so already planned for Tring are required to satisfy the Government targets, then the Dunsley Farm site is the most logical site to develop given that it is close to the centre of Tring and therefore would not extend the current boundaries</p>

5.If additional houses are to be built in Tring, thought needs to be given to enhancing the infrastructure generally and also increasing local job opportunities, for example through a new business park in the town

**The possible development of the Grove Fields sites under allocations TR-H1, TR-H2 and TR-H3 would increase the geographical area of the town significantly in a direction well away from the town centre, fundamentally changing the overall characteristics of the town**

**GFRA Response to Question 46, full document attached to question 46**

We have analysed the DBC's "Evidence Base" documentation and provide our "*feedback*" regarding the sites contained in the "*draft schedule of site appraisals*" and the "*sustainability appraisal*" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

#### Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "*...about 2500 new homes and 55ha of new employment land...*" and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved...*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:



"...Green Belt boundaries should only be altered in exceptional circumstances..."  
(*Emphasis added*)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."  
(*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "*...exceptional circumstance...*" in accordance with the NPPF to "*...justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "*...exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

ALC Conclusions Table

**SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3").

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**  
**SSA Site Reference 22**  
**LS Conclusions 23**  
TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

	<p>TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.</p> <p><u>Conclusion</u></p> <p>In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating <b>TR-H5</b> and <b>TR-H6</b> would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.</p> <p>The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17833
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b></p> <p>To the extent that there is a requirement to build additional homes in Dacorum, they should be focussed primarily in Hemel Hempstead which is a town that has</p>

	<p>ben developed with the infrastructure to support a much larger community</p> <p>To the extent that additional homes beyond the 500 or so already planned for Tring are required to satisfy the Government targets, then the Dunsley Farm site is the most logical site to develop given that it is close to the centre of Tring and therefore would not extend the current boundaries</p> <p>If additional houses are to be built in Tring, thought needs to be given to enhancing the infrastructure generally and also increasing local job opportunities, for example through a new business park in the town</p> <p>The possible development of the Grove Fields sites under allocations TR-H1, TR-H2 and TR-H3 would increase the geographical area of the town significantly in a direction well away from the town centre, fundamentally changing the overall characteristics of the town</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached to question 46</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17880
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<b>We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).</b>

To the extent that there is a requirement to build additional homes in Dacorum, they should be focussed primarily in Hemel Hempstead which is a town that has been developed with the infrastructure to support a much larger community

**GFRA Response to Question 46, full document attached**

We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17882
<b>Full Name</b>	David and Jane Elsmore
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes

Your response - Please add your response here

**We are members of the Grove Field Residents Association and support the analysis and conclusions of the planning consultants commissioned by the Association (attached).**

4. To the extent that additional homes beyond the 500 or so already planned for Tring are required to satisfy the Government targets, then the Dunsley Farm site is the most logical site to develop given that it is close to the centre of Tring and therefore would not extend the current boundaries

5. If additional houses are to be built in Tring, thought needs to be given to enhancing the infrastructure generally and also increasing local job opportunities, for example through a new business park in the town

**The possible development of the Grove Fields sites under allocations TR-H1, TR-H2 and TR-H3 would increase the geographical area of the town significantly in a direction well away from the town centre, fundamentally changing the overall characteristics of the town**

**GFRA Response to Question 46, full document attached to question 46**

We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.

#### Principal Contention

Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".



In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State...*" (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "*...relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "*...exceptional circumstance...*" in accordance with the NPPF to "*...justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential

development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
  - Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane  
/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3").

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one

of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

*21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

*22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.*

*23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.*

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the

settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.

The DBC should, therefore, mindful of its obligation to take account of all "...relevant considerations..."<sup>24</sup> and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, **TR-H5** and **TR-H6** as locations for the same.

*24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.*

<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17891
<b>Full Name</b>	Dave Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	

<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.</b></p> <p>I appreciate the need for additional housing in the region and that it is easier and cheaper to build on previously unused/agricultural land. However this does nothing to improve the ecology of the area or country. Especially as there are brown field sites available.</p> <p>The impact on the loss of green spaces should not be underestimated in terms of the well being to the local population, but also to the local wildlife. I have personally witnessed Barn Owls, Kestrels, Falcons and numerous species of butterflies in Grove fields in the past 12 months.</p> <p>In addition there is some doubt that Tring could tolerate a population increase as the schools are full and we are losing services from the town centre. The last remaining bank has announced it is closing its branch. The local doctors surgery is also already stretched to beyond its limits. There seems to be little consideration for the infrastructural issues, both during construction or after construction to service the needs of the increased population.</p> <p><b>Please give this report your urgent consideration.</b></p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17938
<b>Full Name</b>	Dave Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.</b></p> <p>I appreciate the need for additional housing in the region and that it is easier and cheaper to build on previously unused/agricultural land. However this does nothing to improve the ecology of the area or country. Especially as there are brown field sites available.</p> <p>The impact on the loss of green spaces should not be underestimated in terms of the well being to the local population, but also to the local wildlife. I have personally witnessed Barn Owls, Kestrels, Falcons and numerous species of butterflies in Grove fields in the past 12 months.</p> <p>In addition there is some doubt that Tring could tolerate a population increase as the schools are full and we are losing services from the town centre. The last remaining bank has announced it is closing its branch. The local doctors surgery is also already stretched to beyond its limits. there seems to be little consideration for the infrastructural issues, both during construction or after construction to service the needs of the increased population.</p> <p><b>Please give this report your urgent consideration.</b></p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p><i>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</i></p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p>

	The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17940
<b>Full Name</b>	Dave Davies
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b>Please find attached a reports commissioned by a residents association (GFRA) challenging the current plants for additional building in the Tring area.</b></p> <p>I appreciate the need for additional housing in the region and that it is easier and cheaper to build on previously unused/agricultural land. However this does nothing to improve the ecology of the area or country. Especially as there are brown field sites available.</p> <p>The impact on the loss of green spaces should not be underestimated in terms of the well being to the local population, but also to the local wildlife. I have personally witnessed Barn Owls, Kestrels, Falcons and numerous species of butterflies in Grove fields in the past 12 months.</p> <p>In addition there is some doubt that Tring could tolerate a population increase as the schools are full and we are losing services from the town centre. The last remaining bank has announced it is closing its branch. The local doctors surgery is also already stretched to beyond its limits. there seems to be little consideration for the infrastructural issues, both during construction or after construction to service the needs of the increased population.</p> <p><b>Please give this report your urgent consideration.</b></p> <p><b>GFRA Response to Question 46, full document attached</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p>



Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

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*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional*

circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (*Emphasis added*) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [*however*] ... Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (*Emphasis added*)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- *Ibid*, 17

#### ALC Conclusions Table

**SSA Site Reference**

**Location**

**Use**

**ALC Conclusions 19**

TR-H1

Land to the North

of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road

(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London

Road

Open Fields / Business Use (circa

0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way

(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and

Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the *Natural*

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "*partial amendment*" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would

	<p>cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.</p> <p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations</i>..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p><i>24 See House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO17942
<b>Full Name</b>	David Vaughan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of Berkhamsted I wish to register my concerns about a number of aspects of the proposed new Local Plan for Dacorum as it could impact Berkhamsted.</p> <p>Whilst I recognise the need for further housing and jobs nationally and, as far as can reasonably be accommodated, within Dacorum I am concerned that the options that the options being presented do not provide any clarity or explicit commitments with regard to what improvements in infrastructure will be put in place to mitigate the increased demand on services.</p> <p>Berkhamsted is a substantially linear town in a valley. It is further essentially split in two by the railway and the Grand Union Canal. Land on either side of these features is hilly with the majority of the proposed development sites a significant distance from the town centre. Developing most, if not all, of the proposed sites would create pockets of housing which would be reliant on private cars to get to the town centre for shopping, the station or to local commercial and/or industrial sites. The existing road system is already often heavily congested and adding a significant amount of additional traffic on any of the key roads will make this problem worse. Given the distances and the slopes involved it is unrealistic to assume that many people will be able to walk or cycle from these new housing estates and it is difficult to see how this structural issue could be effectively addressed.</p>

	<p>The local plan options do not provide any clarity on how this problem would be addressed. From what I was told at the local consultation meeting I understand that it would be the responsibility of the Highways Agency to look at the issues on a retrospective basis. I do not consider this is to be an adequate or credible response.</p> <p>Much of the existing social infrastructure in the town is already very stretched. Speaking from personal experience the GP practices are already overloaded and any significant increase in population would make the situation worse. Again the local plan is not explicit about what additional provision, if any, would be made and given the squeeze on all departmental budgets it has to be assumed that at best this would be little and late.</p> <p>As is the case with many successful commuter towns the rail network is already very heavily loaded with little or no spare capacity. None of the planned options identifies any new employment land in Berkhamsted so it seems only reasonable to assume that a significant proportion of the new residents would need to travel by train to work and it is by no means clear that the current network is adequate or that it can be enhanced to support such an increase.</p> <p>Part of the attraction of Berkhamsted is that it has managed to maintain a sense of identity and community. In my opinion any of the more extensive development options is likely to risk severely damaging this by putting further pressure on very stretched infrastructure and by fragmenting the community.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17944
<b>Full Name</b>	Caroline and Peter Armstrong
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>We wish to comment on the proposals for Bovingdon as follows;-</p> <ol style="list-style-type: none"> <li>1 The four proposed sites in Bovingdon are all green belt land. This conflicts with Dacorum's Core Strategy to "minimise impact on the Green Belt" and "safeguard countryside". Once Green Belt land is built on it is lost forever. The Green Belt land is what separates Bovingdon from Hemel and preserves its separate identity. By building on Green Belt land in Bovingdon and surrounding villages, each of their separate identities is eroded and Hemel as a town will swallow up these villages, like Leverstock Green which was an old village but is now a suburb of Hemel.</li> </ol>

	<p>2 The proposal to build 450 new homes in Bovingdon will increase the population of the village by at least 25%. More people means more cars, more congestion, more pollution. Already stretched services being stretched further.</p> <p>3 There are already major traffic problems in the village. The high street is a narrow road which is already overloaded and frankly dangerous at present. Cars are mounting the pavements to pass each other (sometimes at speed). With the busy village centre and school it is an accident waiting to happen and there have been near misses. Hempstead Road is again what was originally a country lane but is now a major through fare for large lorries all hours of the day and night. Box Lane is frequently congested at the weekends, with traffic backing up to the golf course. A bypass road directing traffic away from the village and onto the A41 is required NOW. More homes will increase traffic on an infrastructure already under pressure. More traffic means more pollution, negative impact on air quality, quality of the life and road safety.</p> <p>4 The village community services are already at capacity. The school and doctors are overloaded. One surgery is shared with Kings Langley and therefore the proposed increases to both Kings Langley and Bovingdon will mean that it is doubly impacted.</p> <p>5 Bovingdon will suffer an environmental impact with such a dramatic increase in new homes and loss of Green Belt land.</p> <p>6 The proposals to build 450 new homes in Bovingdon are not sustainable without major investment <u>upfront</u> in the infrastructure and services.</p> <p>7 The best outcome for Bovindon presently is Option 2B - <u>0 new Homes</u>.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17947
<b>Full Name</b>	Mr Robert Bailey
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to give you my feedback on the planning consultation that you are running for Dacorum.</p> <p>My key points are:</p> <ul style="list-style-type: none"> <li>Your options appear to be driven by meeting arithmetic government targets and do not take into account requirements of the borough. This is particularly true for Berkhamsted where you have</li> </ul>



	<p>put forward options that do not take into account the geography and the effect that this has on the infrastructure. You should look at what can be realistically achieved without damaging the town irreparably. I believe that this is a significantly lower development target than most of your current proposals.</p> <ul style="list-style-type: none"> <li>You have not looked at working with St Albans to coordinate a response to government. The area east of Hemel Hempstead and west of the M1 should fulfil a lot of local development needs but appears to be counted elsewhere!</li> <li>You seem to be prepared to release greenbelt land which will damage the environment and the local area. This is not acceptable to me.</li> <li>In summary I believe that you need to create a plan based on real capacity for change. In Berkhamsted given the geography and infrastructure limitations, the target for development should be no higher than the current plan (which has, I believe, almost been achieved.)</li> </ul>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17949
<b>Full Name</b>	Mrs Lucy McRae
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>1A is my preferred option as it focuses the larger housing developments into existing larger towns which already have good infrastructures for larger populations. The charming, small village of Kings Langley would change beyond measure (and not for the good) if such large housing developments went ahead there.</p> <ul style="list-style-type: none"> <li>- We would feel great sadness at losing the herd of jersey cattle at Wayside Farm. It would result in loss of employment by the farm staff as well as a beautiful and informative place to walk and purchase locally produced goods.</li> <li>- Increased pollution from increased vehicles would harm our environment, nature and health.</li> <li>- Our small village of Kings Langley's infrastructure is not set up for such a large growth in population.</li> <li>- GPs are already stretched.</li> <li>- Parking is frequently difficult.</li> <li>- Public transport is already stretched. Peak time trains are already 'standing only'.</li> <li>- Traffic is often bad - particularly on every occasion there is a problem on the A41, M1 or M25. Where would more cars go?</li> </ul>

	<p>- My son did not get into any of our 4 choices of primary schools due to lack of spaces. Most of the existing primary schools only have limited scope to grow sufficiently to cope with the proposed growth.</p> <p>- The secondary school has just been rebuilt - is there capacity there to increase its size already?</p> <p>Having moved from London to raise a family, I love living in a village the size of Kings Langley and enjoy being part of a good-sized community where I can help to make a difference alongside community organisations (a playgroup, Children's Centre, Parent Teacher Association). Potentially doubling the size of the village through mass housing developments would sadly change this forever. And the place where my children are growing up would become just another Hemel or Watford unfortunately.</p> <p>I do understand that more housing is required in this area and across the country, but please consider brownfield options before building on our beautiful greenbelt areas and permanently ruining them for now and our future generations. Thank you.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17950
<b>Full Name</b>	Janet Sparks
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Berkhamsted is a historic market town in Hertfordshire. After visiting your recent planning exhibition at the Civic Centre, it seems you are determined to allow opportunistic developers to destroy our town for future generations.</p> <p>The town is already jammed with cars and parking is virtually impossible. To add further houses as your plan outlines would add 4000 more cars. The roads are not big enough. The main road through town cannot be sufficiently widened. The narrow streets off the main road are already jammed with double parked cars. Your plan for extra houses will grid-lock the whole of Berkhamsted.</p> <p>The current bus routes already have difficulty in navigating the parked cars in streets, and the time taken to travel has increased due to traffic congestion. The extra traffic caused by your plan will severely impact on bus routes and bus journey times.</p> <p>It generally takes about 20 minutes to drive a 750 yard stretch through the town due to congestion.</p>

Berkhamsted is a steep-sided valley town with, therefore, a lot of hills. The buses don't serve where I live, therefore, public transport is not an option for me and many in the town to go shopping (a 2 - 3 mile round trip).

Extra traffic due to over building of houses will create chaos. The existing density of housing already causes this amount of traffic on roads which were never constructed to take the present volume of traffic. Your plan fails to address the massive increase in resulting traffic on these roads – 4000 additional cars. Current housing prevents widening or new road building. Your plan ignores this and there is no attempt to address the problems caused.

Currently waiting time for a doctor's appointment is 7 – 10 days. Add the extra households you are planning and a doctor's appointment will become impossible in under a month. This is totally unacceptable to the sick and elderly. To get a dentist's appointment takes up to a month - and then you have to pay for a private appointment. If the new housing plan goes ahead an appointment to see a dentist will escalate to 3 months - and as likely as not their fees will increase.

The current plan has seen 628 houses built with a further 600 already planned. Even with this increase the current primary and secondary school places required will struggle to meet demand. Your plan for even more households will cause the education system to fail as it will be unable to meet the demand. What impact will this have on our children in Berkhamsted?

There are unrealistic assumptions in the proposed DBC plan. Mental Health and culture seems to have been ignored. There is no guarantee of funding to provide the requirements. DBC assumes that others will provide the additional funding for buildings and staffing. It also fails to address the land and location of such needs.

Builders /developers have paid lip service to any previous plans for affordable housing , and paid the Council so that they can build more expensive houses instead - and make even bigger profits! This has been a mockery of what the Council proposed. The new plans for affordable housing in Berkhamsted, based on actual DBC past acceptance of "buy-off's", will equally fail to provide affordable housing.

St Albans recent failure to co-operate has recently been highlighted by the Secretary for State. St Albans proposed extension to east Hemel should be reflected in DBC numbers.

The DBC Green Belt Plan is flawed. Any adjustments in Green Belt should have been completed before considering planned new sites. The consultants/DBC have ignored current policy to protect Green Belt. Even accepting some requirements may need adjustment, the scale indicated in your plans ignores both intentions and policy to protect Green Belt. Brown Field sites must have priority. DBC has, in fairness, has utilised this option in Hemel Hempstead. There remain further sites that can be developed.

The Government has suggested an increase from 430 to 602 new homes. The new plan deviates from this to

	<p>much, much higher levels. The new plan promotes a level of 756 which is higher than the 602 Government target.</p> <p>I have lived here since 1992 and the amount of house building has been incredible. It has now reached saturation. Your proposals should be limited to Option 1B - <u>to limit house building in Berkhamsted to the extra 600 houses already planned.</u></p> <p>Berkhamsted has already been more than fair with 34% more houses than the target already built - 10 years of houses built in the first 5 years of the current plan alone. Hemel Hempstead is 21% behind target and there are also opportunities for more housing in Kings Langley.</p> <p>The best option is to concentrate growth in and around Hemel Hempstead, Option 1b. This former new town as a sub-regional centre is best equipped to accommodate growth. Other options should be dropped.</p> <p>I fail to understand why, having robustly defended annual growth of 430 homes 3 - 4 years ago, our Councillors and Planners are now promoting a 75% increase?</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17951
<b>Full Name</b>	Shenagh Franklin
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>As a resident of Berkhamsted for the last 34 years, I have already seen a big increase in the number of new homes recently without the development of a suitable infrastructure. There has been increased traffic in the town, overcrowded trains and pressure on medical provision and schools, not to mention the increased abstraction of water, leading to the drying up of the River Bulbourne. In a steep-sided valley such as ours, the provision of new homes on Green Belt at the top of the hills will have a visual impact and is going to cause more congestion and pressure on the town services as new residents will not cycle or walk up the steep hills to those houses so there will be more cars in the town centre which will change the character of the town. Existing residents like living in Berkhamsted and we need to ensure it will continue to be a good place to live in the future.</p> <p>I choose Option 1B.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17953
<b>Full Name</b>	Karen Johnson

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I object to the DBC Local Plan issues in Berkhamsted for the following reasons:-</p> <ol style="list-style-type: none"> <li>1 Berkhamsted is a beautiful market town, it has very narrow roads that is is not possible to widen. The suggested influx of cars would make it impossible to get around the town. The pollution would also be terrible and made worse by the fact the town is in a valley. The considerable hills also make cycling and walking unviable and again aside of the hill aspect there is no space to put in cycle lanes or room for buses on a lot of routes.</li> <li>2 GPs and dentists are already completely overstretched, it is almost impossible to get appointments now without the introduction of more people.</li> </ol> <ol style="list-style-type: none"> <li>1 The train station would not be able to cope with the capacity of both people and parking. Anybody wanting to get the train from the suggested new developments would need to drive which will be impossible on the clogged roads. When they actually get to the station there will be nowhere to park and not enough space on the train. It is already very difficult to get to the car park from the town side as access is through an arched bridge one car at a time.</li> </ol> <ol style="list-style-type: none"> <li>1 What is the point of green belt areas if we build on them. The whole point was to stop urban sprawl. We are now being pushed by developers to build on these areas which serves no benefit to the community and in fact gives a negative impact with the loss of green spaces and trees. On top of that as part of the Chilterns we are supposed to be in an area of outstanding beauty which should be protected.</li> </ol> <ol style="list-style-type: none"> <li>1 Our schools will not be able to cope with the increase in population, where are an increase of 25% of children going to go to school?</li> </ol> <p>Anyone with half a brain should be able to see that the building of all these new homes is totally unviable in our market town with its limited infrastructure. Whilst people may come initial with the excitement of a new home, that will soon wear off when people realise that the services and facilities are terrible and subsequently people will look to leave. It will become a stressful and unhealthy place to live and totally spoilt by</p>

	<p>overdevelopment where the only winners are the developers.</p> <p>As far as I can see the only viable choice is (question 40) option 1B to limit the building to the extra 600 houses already planned. Pressure should also be put on the areas in Dacorum who have not fulfilled their targets like Hemel which is 21% below target. Berkhamsted is already being more than fair with 34% more houses than the target already built which equates to 10 years of house building in the first five years of current plan alone. From what I can see all these other areas are trying to push it in Berkhamsted direction and we need to push back. We do not need a 25% increase in the population it is unsustainable and that figure alone shows that it is totally disproportionate. The government also need to look at the building of new towns with complete infrastructures like has been done in Aylesbury rather than badly thought out quick fix add ons.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LP1017955
<b>Full Name</b>	Rachel and John Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My friend and I attended Berkhamsted Town Council Public meeting on 22 November and came away feeling very depressed by the proposed actions to do with Berkhamsted.</p> <p>The whole point of Green Belt, as I understand it, is to protect the environment adjacent to towns and enhance the lives of the various communities living nearby.</p> <p>Green Belt is protected by law and yet you are planning to build on various bits of Green Belt land around Berkhamsted. A member of the public at the above meeting had a letter dated last year from a Government department saying that the Government would never ever touch or build on the this land and yet apparently according to one of the Councillors, they will get around this by de-regulating some of the areas, if not all, around Berkhamsted (and presumably elsewhere). Technically this would mean that these areas were no longer Green Belt and up for grabs. WHAT IS THE POINT OF THE GREEN BELT LAW if it can be ignored by this travesty?</p> <p>Do Dacorum Council and the Government think that residents are downright stupid and cannot see through this hypocrisy? What about using brown fill sites – I realize that it is cheaper to build on ‘fresh’ ground than on brown fill sites but why should developers have it all their own way and just for more and more profit.</p>

Some of the Green Belt land around Berkhamsted overlooks or is close to "Areas of outstanding Natural Beauty".

At this Town Council meeting we learnt that:

Berkhamsted has already exceeded its quota by 34% more houses built than the target – 10 years of houses built in the first 5 years of implementation. Ditto Tring to a lesser degree.

Whereas Hemel Hempstead is 21% below target and this is a "new Town" with a far less difficult area to build extra housing. Berkhamsted on the other hand is a steep sided valley which is already at bursting point. Building more houses will add 4000 more cars (that's 24,000 journeys each day). The building of the new multi-storey car park off the Kings Road will probably be filled to capacity in no time whatsoever. Personally although I am in favour of the multi-storey car park, the building of it will cause terribly congestion and chaos during its building. Saturday now is already chaotic

Incidentally, the car park at Berkhamsted station appears to be filled to capacity and where are these extra commuters going to park their cars?

Infrastructure – there never appears to be any thought in this direction. Parking is chronic, High Street now is a congested and highly polluted area, and schools had to be changed from a 3 tier system to a 2 tier system in order to provide school places. Initially of course there was this idea of sending new primary school children to Hemel Hempstead until there was a massive outcry. Doctors Surgeries are full etc etc etc. The state of the roads now is pretty bad what will it be like with more cars?

Obviously developers want to build in Berkhamsted and Tring because they make more money with ridiculously high profit margins.

Another point, if a developer wants to build flats why doesn't the Planning Department insist that they build sufficient **underground parking**.

Developers should have been made and should be required to build affordable housing in Berkhamsted and not get away with simply handing over a certain amount of money. Also public transport should be increased so that in the event that affordable housing is built, it should be accessible to these areas.

With reference to the building in the field behind Upper Hall Park, Dacorum Council rejected the initial planning application (and some of the other proposed areas) and

	<p>why is it being put forward yet again? I presume yet again that 1 exit road to the High Street/London Road is down Swing-gate lane with a school at the top of the hill and another at the bottom of the hill. Ludicrous – what about the health of our primary school children, let alone their safety?</p> <p>My husband and I moved to Berkhamsted over 40 years ago and raised our 2 boys here. It is a lovely historic and attractive town and over development has partially ruined already, what will happen to it if the new developments are allowed to continue?</p> <p>I gather that the Developers have promised various incentives and one wonders if they will come to pass. It is very easy to promise the world and then renege once the documents/plans have been signed off. I gather that one idea was that people would walk or cycle from the South Berkhamsted – that will not happen, we are too used to driving around in our cars.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17956
<b>Full Name</b>	Rachel and John Chapman
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My friend and I attended Berkhamsted Town Council Public meeting on 22 November and came away feeling very depressed by the proposed actions to do with Berkhamsted.</p> <p>The whole point of Green Belt, as I understand it, is to protect the environment adjacent to towns and enhance the lives of the various communities living nearby. Green Belt is protected by law and yet you are planning to build on various bits of Green Belt land around Berkhamsted. A member of the public at the above meeting had a letter dated last year from a Government department saying that the Government would never ever touch or build on the this land and yet apparently according to one of the Councillors, they will get around this by de-regulating some of the areas, if not all, around Berkhamsted (and presumably elsewhere). Technically this would mean that these areas were no longer Green Belt and up for grabs. WHAT IS THE POINT OF THE GREEN BELT LAW if it can be ignored by this travesty? Do Dacorum Council and the Government think that residents are downright stupid and cannot see through this hypocrisy? What about using brown fill sites – I</p>



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	<p>With reference to the building in the field behind Upper Hall Park, Dacorum Council rejected the initial planning application (and some of the other proposed areas) and why is it being put forward yet again? I presume yet again that 1 exit road to the High Street/London Road is down Swing-gate lane with a school at the top of the hill and another at the bottom of the hill. Ludicrous – what about the health of our primary school children, let alone their safety?</p> <p>My husband and I moved to Berkhamsted over 40 years ago and raised our 2 boys here. It is a lovely historic and attractive town and over development has partially ruined already, what will happen to it if the new developments are allowed to continue?</p> <p>I gather that the Developers have promised various incentives and one wonders if they will come to pass. It is very easy to promise the world and then renege once the documents/plans have been signed off. I gather that one idea was that people would walk or cycle from the South Berkhamsted – that will not happen, we are too used to driving around in our cars.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17985
<b>Full Name</b>	Nicky & Paul Bayliss
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I live in Kings Langley with my husband and 2 young children. I am so disappointed about yet more development being proposed for our village. This is our official and strongest objection to the overdevelopment of our village - all four sites in Kings Langley.</p> <p>We are a village, not a town and these plans will destroy the village and our community. We simply won't be a village anymore, we'll end up merging with Apsley/Hemel Hempstead and into Watford. Surely urbanisation of our local villages can't be what the council or the government want longer term?</p> <p>I understand the need for more housing, but this can easily be built on brownfield sites rather than greenbelt land. I thought the whole point of greenbelt land was to prevent exactly this, to stop over-urbanisation of our country.</p>

What I don't understand are the plans for more offices in our village. We already have the college and office buildings that have gone up on the outskirts of the village (by the station), coupled with empty office space at Westside in Apsley and close by in Leavesden (and I'm sure there must be more).

To be clear we object to:

- 1 **The overdevelopment and the use of greenbelt land.**
- 2 **The loss two dairy farms.**

Supporting local businesses is important, for our community and for our economy. I really don't understand the need to evict the tenant at Wayside Farm for example which is such a big part of our village and community for planning. And particularly to replace them with office buildings. What's the longer term strategy here? How does this effect the rest of our country? If it happens here where else is it happening? I'm at a loss as to how anyone can justify removing a local farm for office buildings.

#### 1 **Building of offices in a village**

Especially when there is empty office space in the surrounding areas (Apsley and Leavesden).

#### 1 **Losing the identity of our village**

Kings Langley is just that a village. We moved here and chose to raise our family here for that very reason. if we wanted a town we could have easily (and more cheaply) moved to Hemel Hempstead or Watford. More development would simply mean we won't be a village anymore. It could also have the knock on impact of the value of property in our village.

#### 1 **Over capacity - roads/schools/car parks/GP surgeries**

We live on Coniston Road (which has access to both schools) the roads during this time are gridlocked. As is the high street during peak times. Bringing in more housing and offices will only add to the congestion.

Schools are at capacity and even now people in the village cannot get into the local primary school (I don't have experience on the secondary school so can't comment). And we have two lovely little car parks to access our high street - how will that be managed? And what about the doctors surgery? We have an excellent surgery, I can always get my kids in to see a GP when they to, I can only imagine the disruption on the healthcare in the village with more development and residents.

I urge you for the sake of our village and our families growing up in our village to reconsider and stop further planning in Kings Langley.

<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17986
<b>Full Name</b>	Nicky & Paul Bayliss

<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I live in Kings Langley with my husband and 2 young children. I am so disappointed about yet more development being proposed for our village. This is our official and strongest objection to the overdevelopment of our village - all four sites in Kings Langley.</p> <p>We are a village, not a town and these plans will destroy the village and our community. We simply won't be a village anymore, we'll end up merging with Apsley/Hemel Hempstead and into Watford. Surely urbanisation of our local villages can't be what the council or the government want longer term?</p> <p>I understand the need for more housing, but this can easily be built on brownfield sites rather than greenbelt land. I thought the whole point of greenbelt land was to prevent exactly this, to stop over-urbanisation of our country.</p> <p>What I don't understand are the plans for more offices in our village. We already have the college and office buildings that have gone up on the outskirts of the village (by the station), coupled with empty office space at Westside in Apsley and close by in Leavesden (and I'm sure there must be more).</p> <p>To be clear we object to:</p> <ol style="list-style-type: none"> <li>1 <b>The overdevelopment and the use of greenbelt land.</b></li> <li>2 <b>The loss two dairy farms.</b></li> </ol> <p>Supporting local businesses is important, for our community and for our economy. I really don't understand the need to evict the tenant at Wayside Farm for example which is such a big part of our village and community for planning. And particularly to replace them with office buildings. What's the longer term strategy here? How does this effect the rest of our country? If it happens here where else is it happening? I'm at a loss as to how anyone can justify removing a local farm for office buildings.</p> <ol style="list-style-type: none"> <li>1 <b>Building of offices in a village</b></li> </ol> <p>Especially when there is empty office space in the surrounding areas (Apsley and Leavesden).</p> <ol style="list-style-type: none"> <li>1 <b>Losing the identity of our village</b></li> </ol> <p>Kings Langley is just that a village. We moved here and chose to raise our family here for that very reason. if we wanted a town we could have easily (and more cheaply) moved to Hemel Hempstead or Watford. More</p>

	<p>development would simply mean we won't be a village anymore. It could also have the knock on impact of the value of property in our village.</p> <p><b>1 Over capacity - roads/schools/car parks/GP surgeries</b></p> <p>We live on Coniston Road (which has access to both schools) the roads during this time are gridlocked. As is the high street during peak times. Bringing in more housing and offices will only add to the congestion.</p> <p>Schools are at capacity and even now people in the village cannot get into the local primary school (I don't have experience on the secondary school so can't comment). And we have two lovely little car parks to access our high street - how will that be managed? And what about the doctors surgery? We have an excellent surgery, I can always get my kids in to see a GP when they to, I can only imagine the disruption on the healthcare in the village with more development and residents.</p> <p>I urge you for the sake of our village and our families growing up in our village to reconsider and stop further planning in Kings Langley.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17987
<b>Full Name</b>	mr declan meagher
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to submit my objection to the proposed development of the sites in and around Kings Langley and would therefore wish for option 1A to be invoked if any.</p> <p>The reasons for my objections are, briefly:</p> <p>The infrastructure of Kings Langley struggles currently. In the case of significant expansion, I cannot see if being upgraded commensurately</p> <p>I think that, axiomatically, there will never be any truly affordable housing released to market, the reason being it will be at market value which appears to be artificially high.</p> <p>I think the real housing crisis is at the very lower end and new build houses will not address this problem.</p>

	<p>There hasn't been an adequate brownfield survey of the UK yet and I think this needs to be properly considered before any decisions are taken that erase greenbelt.</p> <p>Additionally there is a large quantity of unused and unoccupied housing.</p> <p>To build on greenbelt would see it irrevocably lost for future generations, transmogrify the village and sadly begin the process of melding it with nearby towns.</p> <p>I think development benefits the developers primarily yet conversely represents a more of a cost than a benefit to the community in broad terms.</p> <p>I object to the governments imposition of quotas on councils and I think there should be a push back against it. By most government metrics net migration into the UK is set to fall with Brexit. According to ONS figures we have a housing surplus of roughly 5% and the quantity of houses above households has been increasing longitudinally over the last 3 decades. There appears to be an inconsistency here.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17989
<b>Full Name</b>	George Thomas
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p><b><u>“NO”</u></b> – to Proposed Local Plan New Homes in <b><u>“BOVINGDON”</u></b>.</p> <p><b>The Infrastructure is <u>“BROKEN”</u></b></p> <p><b>The Only Options for BOVINGDON are “2B NONE” or the AIRFIELD.</b></p> <p>Given the traffic problems in Bovingdon (The High Street, Box Lane &amp; Chesham Road being well rehearsed) the most dangerous road in Bovingdon (GREEN LANE) is being proposed with possibly two accesses for hundreds more vehicles.</p> <p>Green Lane which does not even come anywhere near “B Road” standards is an unsuitable Bus Route, carries extensive commuting and “Rat Run” traffic, is used by oversized commercial and farming traffic, is mostly “Single Footpath” and has Poor or No existing Sight Lines and Blind Accesses.</p>

	<p>Given the above and two extensive pinch points due to inadequate road width and parking 50% of the traffic is forced onto the wrong side of the road (where there's no footpath) from the High Street to The Green at inappropriate speed blocking oncoming traffic and causing numerous incidents and recently a potentially fatal accident.</p> <p>Clearly it is ludicrous to even consider two additional inappropriate accesses (particularly Louise Walk) and scores of vehicles onto this already Chaotic and Inadequate LANE where there is no room for improvement and which even in its present state breaches many Highway Rules and Regulations.</p> <p>The following are all Major Infer Structural areas that are totally inadequate and incapable of coping with the present capacities required by Bovingdon.</p> <p>Traffic, Parking, Retail, Services &amp; Infrastructure in the High Street,</p> <p>School and Medical Services: - At Capacity.</p> <p>Highways: - Box Lane, Chipperfield Road, Chesham Road, Lanes off the Green.</p> <p>Services &amp; Drainage: - At Capacity - (3 days of Electricity cuts this week)</p> <p>Flooding of Properties &amp; Businesses: - Lower High St.</p> <p>I am sure other objectors will go into the above items and other matters in more detail I have therefore just a listed "Headings" of a few of the Infrastructure problems that exist in Bovingdon.</p> <p>Given that there are other areas of land identified in Dacorum's Plan where a "Purpose Designed New Development" with all the necessary facilities, infrastructure and easy access to jobs could be built to meet the council's requirements. This appears a much more practical and desirable proposal than building on Bovingdons Green Belt with no additional infrastructure capacity and all its existing logistical problems.</p> <p><b>OPTION "2B NONE" FOR BOVINGDON.</b></p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17991
<b>Full Name</b>	David Smith
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to add my name to those who object to the DBC Local Plan to develop on the local green belt.</p> <p>My general objections are as follows:-</p>

	<p>1 There is no evidence within the plan to increase any of the following:-</p> <ol style="list-style-type: none"> <li>1 GP Capacity</li> <li>2 Road Infrastructure</li> <li>3 Schools</li> <li>4 Hospitals</li> </ol> <p>Currently obtaining a GP Appointment is difficult, with the proposed developments this would become impossible?</p> <p>Current access through KL Village and onto the major road infrastructure is terrible.</p> <p>I would like to see some proof that the current infrastructure (Power/Drainage) could support this amount of development.</p> <ol style="list-style-type: none"> <li>1 The impact on community life due to the loss of green space, wild life and loss of an arena of outstanding beauty.</li> <li>2 The loss of workers/owners jobs.</li> <li>3 The fact that the current road structure, through the village of KL is currently unable to offer the free movement of traffic.</li> </ol> <p>I am sure other villages in the proposal surer the same problem.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO17992
<b>Full Name</b>	Gordon King
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wish to register my objection to the proposed developments on the four green belt sites around Kings Langley.</p> <p>I have lived in Kings Langley for almost 20 years and was attracted to Kings Langley because of its strong village atmosphere and sense of community - the local newsletter is aptly named 'The Villager' and we are colloquially known as 'The Village'. This is not just a name, Kings Langley represents every positive trait that the word 'village' conjures. I strongly feel that the proposed developments would merge us into the surrounding urban sprawl and we would irreparably lose our identity much the same way Abbots Langley has. Building on green belt land is akin to selling the family jewels - when they are gone, they're gone forever. Do you want to be responsible for that legacy? I passionately believe that our historical heritage and identity should be protected.</p> <p>There are a number of other concerns I have no doubt I share with others. I look at the parking carnage around</p>



	every new development and have no illusion this will be replicated in the village. I do not believe the local roads will sustain the increase in traffic and that local services will not grow to match inevitable demand. Kings Langley is a beautiful green village - please don't sell it out.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18000
<b>Full Name</b>	mr Richard Lambert
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMEMNT) , my own views can be summarised in a handful of bullet point.</p> <ul style="list-style-type: none"> <li>• Yes, I completely accept that new houses are required in Tring.</li> <li>• The numbers you're specifying at the higher end are not in any way practical given the infrastructure in the town (schools, facilities and transport).</li> </ul> <p>The balance between numbers and locations appears to have not been properly thought through, as there are massive issues regarding the conflict between new build and the AONB restrictions that are in place in Tring</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>

Number	Question 46
ID	LPIO18047
Full Name	mr Richard Lambert
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT), my own views can be summarised in a handful of bullet point.</p> <ul style="list-style-type: none"> <li>• Yes, I completely accept that new houses are required in Tring.</li> <li>• The numbers you're specifying at the higher end are not in any way practical given the infrastructure in the town (schools, facilities and transport).</li> </ul> <p>The balance between numbers and locations appears to have not been properly thought through, as there are massive issues regarding the conflict between new build and the AONB restrictions that are in place in Tring.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding the sites contained in the "draft schedule of site appraisals" and the "sustainability appraisal" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "Issues and Options consultation Local Plan to 2036" refers to "Gorhambury Land at East Hemel Hempstead" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."</p>

	<p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LP1018049
<b>Full Name</b>	mr Richard Lambert
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I wanted to quickly summarise how I feel about your plans for the redevelopment of Tring. I visited the recent Public Consultation event held at the Pendley Manor Hotel and had a conversation with a number of people from Dacorum there. The attached document deftly sets out the detailed views, but in summary (GFRA DOCUMENT), my own views can be summarised in a handful of bullet point.</p> <ul style="list-style-type: none"> <li>• Yes, I completely accept that new houses are required in Tring.</li> <li>• The numbers you're specifying at the higher end are not in any way practical given the infrastructure in the town (schools, facilities and transport).</li> </ul> <p>The balance between numbers and locations appears to have not been properly thought through, as there are massive issues regarding the conflict between new build and the AONB restrictions that are in place in Tring.</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary</p>

to use the Dacorum Green Belt, including that surrounding Tring, for residential development.

Specifically, we note that Page 48 of the "*Issues and Options consultation Local Plan to 2036*" refers to "*Gorhambury Land at East Hemel Hempstead*" (**East Hemel Hempstead**) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:

*"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."*

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "...national policy...", under the Section 19 (2)(a) above, provides:

*"...Green Belt boundaries should only be altered in exceptional circumstances..."* (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

*"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..."* (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments...  
[however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes."  
(Emphasis added)

#### Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales.  
18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- Ibid, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

## ALC Conclusions 19

TR-H1

Land to the North  
of Station Road

Agricultural

Grade 2

TR-H2

Land West of Marshcroft Lane

Agricultural

Grade 2

TR-H3

Land at Icknield Way / Grove Road  
(New Mill),

Agricultural

Grade 2

TR-H4

Land at Cow Lane

/ Station Road

Maintained Open Land

Grade 2

TR-H5

Land at Dunsley Farm, London  
Road

Open Fields / Business Use (circa  
0.7ha)

Not Applicable

TR-H6

Land North of Icknield Way  
(Waterside Way).

Agricultural

Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in

preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural

In addition, the GBR/2 considers the "Overall Landscape Sensitivity" of the six potential Green Belt sites for residential development within Tring. Specifically, it confirms that the methodology it adopts is based on the approaches "...developed in recent years by Landscape East..." and the "...widely accepted professional and technical guidance..." namely the "Natural England, 2014, An Approach to Landscape Character Assessment, and Landscape and Institute of Environmental Management and Assessment 2013, Guideline for Landscape and Visual Impact Assessment, 3rd Edition ("GLV1A3")".

The GBR/2 applies the above and rates each site's sensitivity to changes in the landscape, due to residential and mixed use development, and applies a self-explanatory "High...Medium...[or]...Low" rating to the same.<sup>21</sup> In addition, we note the GBR/2 uses "Green Belt Parcel Numbers", which incorporate more than one of the SSA Site References, and we set out the GBR/2's findings, in this context, within the Landscape Sensitivity Conclusions Table below:

Landscape Sensitivity (LS) Conclusions Table

**Green Belt Parcel Number**

**SSA Site Reference 22**

**LS Conclusions 23**

TR-A2

TR-H2 & TR-H3

Consider for Partial Amendment

TR-A3

TR-H1

Exclude from further assessment

TR-A4

TR-H4

Consider for Partial Amendment

TR-A5

TR-H5

Consider for Partial Amendment

*England Technical Note TIN049 confirms that the ALC system is a material element of Government policy as set out in the Natural Environment White Paper dated June 2011.*

21 See Pages 88 - 98 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

22 We note that TR-H6 does not appear to be included within the Land Sensitivity assessment.

23 See Page 102 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

The above clearly indicates that the DBC is bound to consider the ALC Conclusions and the LS Conclusions prior to making its decision regarding the allocation of any of the six Green Belt sites within Tring for potential residential development. In this context, the DBC's own "Evidence Base" demonstrates the following:

ALC Conclusions: TR-H1, TR-H2, TR-H3 and TR-H4 are classified as Grade 2 agricultural land and TR-H5 and TR-H6 comprises land "...of poorer quality..."; and

LS Conclusions: TR-H1 should be "excluded" from further assessment. TR-H2, TR-H3, TR-H4 and TR-H5 may be considered for "partial amendment" only, however, TR-H6 is not included within the assessment.

In addition, our analysis of GBR/2 indicates:

TR-H1 and TR-H2 provide a distinctive Green Belt boundary to the east of Tring which contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. To develop the same would cause irreparable harm and, on balance, should be avoided. In addition, we note that that sites are within a relatively poor location, in comparison to the other sites, to take advantage of existing transport links and in circumstances where potential sites outside of the settlement (should such a requirement be established) provide easy access to transport link. It should also be noted that the capacity referred to within the technical study, even when adjusted through the SHLAA Assessment, would in any instance be an over-prescription of housing allocation for the area, given the available sites within the existing settlement boundary and on land immediately adjacent to the settlements that have a significantly lower natural environment value; and

TR-H3, similar to the above, contributes significantly to the five functions of the Green Belt set out in paragraph 80 of the NPPF. The land that has been brought forward provides potential development capacity that is considered (if again it is proven to develop into the Green Belt) and over-prescription given the availability of sites within the settlement and in more sustainable locations and given its location it is considered that it would provide significant pressure on Tring's infrastructure, including schools, especially in the eastern end of Tring which does not, in planning terms, have the capacity to improve transport links through to Tring's town centre. The sites ability to access the provisions associated with the market town, therefore, is unsustainable when compared to the other sites allocated to the north and south of the town.

#### Conclusion

In conclusion, on any objective analysis, the DBC's own "Evidence Base", which includes the above, demonstrates that allocating **TR-H5** and **TR-H6** would cause the least harm to the Green Belt and are, therefore, the most preferable of the six Green Belt sites within Tring for potential residential development.



	<p>The DBC should, therefore, mindful of its obligation to take account of all "...<i>relevant considerations</i>..." 24 and make a rational decision based upon its own "Evidence Base" documentation, should choose, if deemed necessary to allocate Tring's Green Belt for residential development, <b>TR-H5</b> and <b>TR-H6</b> as locations for the same.</p> <p>24 See <i>House of Lords in Anisminic v Foreign Compensation Commission [1969] AC 147 - the principle is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.</i></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO18050
<b>Full Name</b>	Mrs Susan de Silva
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>My objections to the Green Belt Development mainly concern the proposed housing development at Wayside Farm</p> <p>1. PROTECTION OF FARMLAND FOR FUTURE GENERATIONS</p> <p>Firstly Green Belt areas should definitely be protected to help with reducing air pollution and Farm Land needs to be kept available for use, especially as Brexit looms and trade with Europe is threatened. The cost of importing food from the other side of the world will be much more expensive than our own home grown produce.</p> <p>It makes sense to save, protect and develop our own farm land to feed future generations. Wayside Farm is considered a major asset to the village and it would be a travesty to lose it.</p> <p>2 TRAFFIC</p> <p>Driving to and from Kings Langley to Watford during the rush hour can take from 45 minutes to an hour. This is normally a ten to fifteen minute journey.</p> <p>Since I moved to the village four years ago the traffic has significantly increased with traffic jams all along the Hempstead Road from the Wayside Farm roundabout to Watford Leisure Centre roundabout. Already at gridlock there is no capacity to increase traffic travelling through Kings Langley. Also there is already insufficient parking in the village.</p> <p>3. EXTRA HOUSING</p> <p>With regard to proving the extra housing required why hasn't the council considered Bovingdon air field site?</p>

	<p>4. VILLAGE CHARACTER This will be most adversely affected with increased housing turning Kings Langley into a town. Overcrowding is likely to cause more social problems.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18051
<b>Full Name</b>	Susan Brazier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I have lived in Kings Langley for over 32 years and have seen many changes over the years.</p> <p>1) Increase in traffic but not necessarily to the benefit of the village.</p> <p>2) Small developments, which are hidden away which was fine.</p> <p>3) More difficulty getting appointments at the doctors due to the increase in population in the village</p> <p>4) The schools are already oversubscribed but there is only provision for a new school at the Shendish development and we as residents have to pay for any additional facilities. This should be paid for by the builders. Infrastructure is so expensive but they have not budgeted for what we will need. It should be one of their expenses.</p> <p>5) What I love about Kings Langley is that it is a village. If all the proposed developments go ahead, it will become a town. We work together because it is a village with all joint ventures. This will be lost if it is extended to the extent that you are fully proposing.</p> <p>6) Having farms around is a great education to the children of the village.</p> <p>A) We used to pick strawberries at Rectory Farm. I would hate this facility to be lost.</p> <p>B) We have an amazing farm where the children can see cows and you can buy unpasteurised milk. So many real farms are disappearing, it would be a tragedy for Wayside Farm to be demolished for houses and office space.</p> <p>Our roads cannot deal with the extra traffic it would bring. It will become impossible to get onto the M25 throughout</p>

	<p>the day. It will be impossible to get through the High Street.</p> <p>WHY MORE OFFICES? We have a white elephant of offices near Kings House that are empty. This is a village and not a Town.</p> <p>I would like to know what proportion of the committee voting on these proposals live in the village and the surrounding affected areas. If people are voting that are not affected, they should be made to read every objection that have been sent before they make their decision. It should be nearly 100% for it to be a true reflection of what our values are.</p> <p>We want to keep the Ethos of the village and protect the Green Belt. This village means so much to me but I don't want it to end up becoming a soulless town.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18052
<b>Full Name</b>	Susan Brazier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	1 A) We used to pick strawberries at Rectory Farm. I would hate this facility to be lost.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18053
<b>Full Name</b>	Susan Brazier
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>6) Having farms around is a great education to the children of the village.</p> <p>B) We have an amazing farm where the children can see cows and you can buy unpasteurised milk. So many real farms are disappearing, it would be a tragedy for Wayside Farm to be demolished for houses and office space.</p>

	<p>Our roads cannot deal with the extra traffic it would bring. It will become impossible to get onto the M25 throughout the day. It will be impossible to get through the High Street.</p> <p>WHY MORE OFFICES? We have a white elephant of offices near Kings House that are empty. This is a village and not a Town.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18054
<b>Full Name</b>	Mr Craig Ridsdale
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>It is quite a challenge to find a word which can be used to effectively gauge some of the proposals to add further houses to one of the UK's most attractive market towns. Perhaps the word that could be chosen is sustainability; its use liberally populates the documents capturing the proposals for Berkhamsted, but also every development appearing in the lay-press.</p> <p>Sustainability must consider the things we control; building developments and those which we cannot control; the long-term impact on the wider community which includes irreplaceable greenbelt and the wildlife that has lived there for centuries. Sustainability, by definition, can mean the ability to be maintained at a certain rate or level and the avoidance of the depletion of natural resources in order to maintain an ecological balance.</p> <p>There is no detail within these plans which clarifies which part of them are sustainable; each of the eight sites; Be-h1, h2, h3, h4, h5, h6, h7 and h8, are all defined as 'land', in virtually all cases greenbelt. Once gone these are gone, forever. You need look no further than existing yet incomplete housing developments on Shootersway to see how their additional traffic has already rendered an already heavily congested road practically impassible during mornings and evenings. This will only worsen should up to 1200 houses be built on Be-h1, 2 and 6.</p> <p>Sustainability must also be applied to Berkhamsted' s already over-stretched existing infrastructure such as schools, healthcare provision, particularly for its aging population, and inevitably parking. New schools have been on the agenda for some time; none built. Where would the children who would live in these houses gain their education? Where would teachers come from and live?</p> <p>Berkhamsted has, like all towns, a steadily growing and aging population which will need care and specialised</p>

	<p>nursing support both now and in the future. Gossoms End Community Hospital was recently closed due to budget cuts; where will funds be found to build others or even re-open this exceptionally well-run centre?</p> <p>How many cars do planners think an additional 1200 homes will have? Making a conservative estimate and say one car for each house. Bearing in mind most will be needed to simply buy food; how will this work? Queues of traffic already choke Lower Kings Road – and this without the prospect of a multi-storey car park. This is completely unsustainable and, at the very least, makes a mockery of the need to create green, ecological transport solutions. Nothing about the plans to build these additional residential properties is sustainable, it is quite the opposite.</p> <p>Berkhamsted should oppose these plans as they subscribe to an agenda driven by simplistic, quick-fix principles that will permanently blight a truly beautiful town.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18055
<b>Full Name</b>	Robert Sheppard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Comments: My family and I are privileged to live in Bovingdon. It is a village of character, community and beauty. I think other people deserve to get the chance to live here at affordable rates.</p> <p>However my key concerns with all plan options are that</p> <ol style="list-style-type: none"> <li>1 the volume of housing proposed in other plans is disproportionate to the current village size relative to other locations.</li> <li>2 Bovingdon has existing structural challenges that will be exacerbated by further housing unless absolute commitments are given to resolve all of <ul style="list-style-type: none"> <li>- parking on the high street</li> <li>- primary school class sizes and catchment areas</li> <li>- access to secondary school places without dividing year groups</li> <li>- improved local transport / pedestrian access / cycleways to Hemel Hempstead and Chesham to allow living here without a car or a second car.</li> </ul> </li> </ol> <p>I would like to see cast iron commitments to address these even if 2b is chosen.</p> <p>I trust we will not see a repeat of the issues around the Leavesden development and ensuing U turn / misinformation on school building</p>

	<a href="#">View full question details for question 46</a> I am grateful for the chance to have a say and hope these fears can be assuaged
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18057
<b>Full Name</b>	Sarah Feehely and Danny Brennan
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would like to register my comments on the proposed over development of our village, bovingdon in Hertfordshire.</p> <p>How it can be considered a measured approach to add 450 homes to a small village without adding to our infrastructure defies belief, we have one small school, how will these children be schooled? We already have problems with parking, traffic, doctors appointments, cutting local transport, flooding, electrical outages, what plans are in place to address 450 new families to our village without adding additional resource to us and impact on daily life.</p> <p>Why is the green belt so readily available now to be developed?</p> <p>Please reconsider this over development it is too much for our small village to adopt, people need new homes, please build the infrastructure and then builders can add some homes around this infrastructure, not the other way round, surely a compromise can be achieved, where all get what they need.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18059
<b>Full Name</b>	Mrs Patricia Hansard
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Green belt land should never be used for house building. Kings Langley is grid locked most of the time and traffic is horrendous. I live in common lane near both schools and it is a total no go area at school entry and exit times.</p>

	Our green spaces should be sacrosanct and our village would no longer be a village but an extension of Hemel.
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18061
<b>Full Name</b>	MR & MRS SMITH
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I would also like to highlight another issue I've recognised and forgot to include in my original email.</p> <p>It is the issue of traffic on the A5 between Markyate and M1 Jct 9. On average it takes me 10minutes to travel the short section, as the traffic is so heavy I crawl along every morning and crawl back every evening. The A5 would not cope with more traffic coming from the many new residents who would come with new housing developments.</p> <p>Something would need to be done about this before new developments begin, especially considering the heavy plant machinery required for building such developments before extra residents even move in.</p> <p>The truck stop causes most of the issues, with lorries pulling on and off the A5 causing the traffic to be stop start.</p> <p>Also traffic shortcutting the A5 along Watling Street (which is supposed to be a no through road and for residents use only). It has gates which would only need to be used occasional to catch people out and deter them from taking the risk of going up there.</p> <p>Please add these to my previous email.</p> <p>(Original comments below added to under LPIO9916)</p> <p>I would like to raise my concerns about new housing being suggested for Markyate.</p> <p>Having been a resident in Markyate and Flamstead all my life, except whilst at university, I believe I have a good understanding of the village.</p> <p>We have lived in our current home on the Hicks Road new development for 3 years and are looking for a new family home, as our downstairs is too small with a child now. We have had our property on the market for 8 months and have been unable to sell it. There is no demand for new housing in Markyate. If you look at many of the property currently up for sale, it is not selling fast. There are several on our estate alone.</p> <p>We also cannot find the type of property we would like if we did manage to secure an offer. It seems to be a stale mate.</p>

	<p>We have huge concerns for yet more housing to be thrown into the mix. The infrastructure which was promised with our development has not happened. The improved doctors surgery, a playground and more shops in the retail units. The retail units remain empty years on and are surely a waste of space and further proof that there is not the demand for property in Markyate?</p> <p>The school has not had investment, the roads have not been improved, adequate parking has not been provided, the drains block and over flow, the public transport is not enough, we have power outages and the broadband and mobile phone signal is poor. The infrastructure already cannot cope for the numbers currently living in the village.</p> <p>We would love to remain in the village and would like a bigger house here, however we will be opposing any new development until money has been spent on improving the infrastructure. We will only agree and support new housing when we are convinced the village is ready to support it and the infrastructure require has been built first.</p> <p>We feel this is necessary due to our experience with recent new developments in the village and infrastructure promised not being delivered.</p> <p>Hopefully our comments can be considered, respected and take seriously during the decision making process.</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18063
<b>Full Name</b>	Mr Brian Isbell
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>I am writing to confirm that as a resident of Kings Langley, I am opposed to the destruction of the character of the village by the proposed housing developments of the surrounding Green Belt. Having carefully studied the proposals and options, I consider Option 1A to be the only acceptable one.</p> <p>The focus of the options does not give adequate consideration to the amount of development that has already taken place in this area of Dacorum. The developments of the Ovaltine, Nash Mills and Aspley Lock have generated a strain on the local infrastructure, from road and train congestion to schools and NHS.</p> <p>Any significant future housing developments in this area, would add further strain to an infrastructure that is already is unable to cope.</p> <p>It is essential for the Council to make an exhaustive survey of the whole Borough to identify all brownfield</p>



	<p>sites that could be developed no matter how small, as together they are likely to meet the requirements for the space required to satisfy future housing needs.</p> <p>I am against development on the Green Belt, which is such a precious resource for health and leisure of not only of the local community but also tourists from far and wide. In addition, some of the options involve the destruction of the farming community which provides employment, local produce as well as making the area so attractive. Shendish, Hill Farm, Rectory Farm and Wayside all contribute to the character of the village and area and the loss or erosion of any of them would affect the nature of the village.</p> <p>The erosion of the Green Belt and the character of the village would be a loss not only to current inhabitants but also future generations.</p> <p>I therefore am strongly opposed to all options apart from Option 1A</p>
<b>Include files</b>	
<b>Number</b>	Question 46
<b>ID</b>	LPIO18071
<b>Full Name</b>	Mr Graham Bright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse</p> <p>My personal position, in summary is as follows:</p> <p>More houses should be allocated to Hemel Hempstead because it is the primary town with, after many years of investment, the required infrastructure to support population growth</p> <p>If development of the green belt is required it should be on TR-H5 and TR-H6 as these sites will have the least impact on the green belt and AONB plus TR-H5 is on a major bus route and is within walking distance of the town centre and sports clubs thus reducing the reliance on car journeys</p> <p><b>Summary Section from GFRA – Executive summary</b></p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within Tring should in total be calculated at a maximum of 800 new homes, including the 500 homes that have already been allocated within the Local Plan and have yet to be fully delivered.</p> <p>At the appropriate figure of 602 homes housing supply per annum it is considered that the delivery of 800 new homes across the plan period is a proportionate delivery for the settlement given the current size and capacity of</p>

	<p>Tring (at approximately 4,500 houses) and its limited commercial, economic and physical infrastructure.</p> <p>Overall in any instance it is considered that the Grove Fields sites, under allocations TR-H1, TR-H2 and TR-H3, do not provide a reasonable, robust or proportionate allocation given the appropriate requirements for the Borough and Tring itself.</p> <p><b>GFRA full document attached</b></p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO18118
<b>Full Name</b>	Mr Graham Bright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <p>More houses should be allocated to Hemel Hempstead because it is the primary town with, after many years of investment, the required infrastructure to support population growth</p> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide "...about 2500 new homes and 55ha of new employment land..." and that the DBC:</p> <p>"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none</p>

	<p>towards Dacorum's...the housing issue remains unresolved...</p> <p><i>This is an important issue as the final decision will obviously affect how much land we will need to allocate for housing in our own area..."</i></p> <p>The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".</p>
<b>Include files</b>	<a href="#">GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</a>
<b>Number</b>	Question 46
<b>ID</b>	LPIO18120
<b>Full Name</b>	Mr Graham Bright
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Agent Name</b>	
<b>Company / Organisation</b>	
<b>Position</b>	
<b>Your Opinion - Please state your opinion here</b>	Yes
<b>Your response - Please add your response here</b>	<p>Please find attached the response from the Grove Fields Residents Association, which I fully endorse.</p> <p>My personal position, in summary is as follows:</p> <ol style="list-style-type: none"> <li>1 If development of the green belt is required it should be on TR-H5 and TR-H6 as these sites will have the least impact on the green belt and AONB plus TR-H5 is on a major bus route and is within walking distance of the town centre and sports clubs thus reducing the reliance on car journeys</li> </ol> <p><b>GFRA Response to Question 46, full document attached to question 46</b></p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "<i>feedback</i>" regarding the sites contained in the "<i>draft schedule of site appraisals</i>" and the "<i>sustainability appraisal</i>" of the same, set out as our "Principal Contention" and "Alternative Contention", below.</p> <p><u>Principal Contention</u></p> <p>Our analysis of the DBC's "Evidence Base" documentation indicates that, on balance, the DBC has failed to demonstrate, in accordance with the relevant legislation and Government policy, that it is necessary to use the Dacorum Green Belt, including that surrounding Tring, for residential development.</p> <p>Specifically, we note that Page 48 of the "<i>Issues and Options consultation Local Plan to 2036</i>" refers to "<i>Gorhambury Land at East Hemel Hempstead</i>" (<b>East Hemel Hempstead</b>) and states the area will provide</p>

"...about 2500 new homes and 55ha of new employment land..." and that the DBC:

"...objected to the fact that St Albans Council assumed all development at East Hemel Hempstead would count towards its own homes and job targets, and none towards Dacorum's...the housing issue remains unresolved..."

*This is an important issue as the final decision will obviously affect how much and we will need to allocate for housing in our own area..."*

The above indicates that DBC is involved in an ongoing dispute regarding the East Hemel Hempstead development. As the DBC recognises the "final determination" of the same will have a significant impact on the volume of land the DBC will be required to allocate throughout Dacorum, including the Green Belt surrounding Tring, for residential development to meet its "housing requirement".

In addition we note that the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**) refers to the NPPF. The NPPF obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004, which provides:

"In preparing a local development document the local planning authority must have regard to—

*(a) national policies and advice contained in guidance issued by the Secretary of State..."* (Emphasis added)

Specifically, Paragraph 83 of the NPPF, a "*...national policy...*", under the Section 19 (2)(a) above, provides:

"...Green Belt boundaries should only be altered in exceptional circumstances..." (Emphasis added)

In this context the DBC's "*Stage 2 Green Belt Review and Landscape Appraisal – Report*" (**GBR/2**), at Page 140, provides:

"...the NPPF (paragraph 83), which states that release of Green Belt land may be appropriate in "exceptional circumstances" and considered through the preparation of the Local Plan. It is thus important to frame the recommendations of this study strategically, balancing them against the findings of other emerging technical works and, subsequently, the emerging spatial vision for Dacorum, the overall supply of land as well as the authority's responsibilities under the duty to cooperate to engage constructively with other neighbouring planning authorities on broad strategic matters, for example housing targets or requirements for infrastructure. Only then may "exceptional circumstances" for possible alternations to the Green Belt boundaries be justified, at both local and strategic levels..." (Emphasis added) In addition, **GBR/2** concludes that it identified:

"...A number of possible boundary amendments... [however] ...Further work should be undertaken by the Council [DBC] to establish whether any "exceptional circumstances" might exist for the proposed changes." (Emphasis added)

Conclusion

In conclusion, we provide the following:

If the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without knowledge of the East Hemel Hempstead "final determination", regarding the number of "homes" which count towards its "housing requirement", then its decision would have failed to take account of a "...*relevant consideration...*", which under the law of England and Wales is a necessary element of a public body's decision making process 17 .

Consequently, and it is a matter of high probability that the DBC's decision could be unlawful; and

The DBC has failed to identify any "...*exceptional circumstance...*" in accordance with the NPPF to "...*justify...*" changing Dacorum's, including Tring's, existing Green Belt boundaries. Similar to the above, therefore, if the DBC allocates Dacorum's Green Belt, including that surrounding Tring, for residential development without identifying such "...*exceptional circumstances...*" it is a matter of high probability that the decision could be unlawful.

#### Alternative Contention

In the alternative, if the DBC proceeds and considers it necessary to allocate the Green Belt surrounding Tring for residential development, its decision must be rational, taking account of the its "Evidence Base" documentation and in accordance with the law of England and Wales. 18

In this context, we note that the DBC's "*Schedule of Site Appraisals (for Greenfield Sites) October 2017 (Draft)*" (**SSA**) includes six Green Belt sites within Tring for potential residential development all of which were included within the DBC's "Green Belt Review" process. Specifically, DBC's **GBR/2** considers a number of factors to assess each site's contribution to the Green Belt measured against the "...*Green Belt's five purposes...*" as defined in Paragraph 80 of NPPF, which we discuss above, including classifying the land using the Agricultural Land Classification (**ALC**) system. We set out the GBR/2's findings within the "ALC Conclusions Table" below:

- See House of Lords in *Anisminic v Foreign Compensation Commission* [1969] AC 147 - the principle is more simply enunciated by Lightman J in *R v Director General of Telecommunications, ex parte Cellcom Ltd* [1999] COD
- *Ibid*, 17

#### ALC Conclusions Table

##### **SSA Site Reference**

##### **Location**

##### **Use**

##### **ALC Conclusions 19**

TR-H1

Land to the North

of Station Road

Agricultural

Grade 2  
TR-H2  
Land West of Marshcroft Lane  
Agricultural  
Grade 2  
TR-H3  
Land at Icknield Way / Grove Road  
(New Mill),  
Agricultural  
Grade 2  
TR-H4  
Land at Cow Lane  
/ Station Road  
Maintained Open Land  
Grade 2  
TR-H5  
Land at Dunsley Farm, London  
Road  
Open Fields / Business Use (circa  
0.7ha)  
Not Applicable  
TR-H6  
Land North of Icknield Way  
(Waterside Way).  
Agricultural  
Not Applicable

Page 59-60 of the GBR/2 refers to the ALC system and states:

"...Grades 1 and 2 are deemed to be the highest agricultural value and should be preserved...the majority of the assessment area is not classified as being grades 1 or 2, with the notable exception of grade 2 agricultural land on the northern and eastern edges of Tring...Sub-areas TR-A1, TR-A2, TR-A3, TR- A4...are either entirely or partially covered by Grade 2 agricultural land..." (*Emphasis added*)

Further, Paragraph 112 of the NPPF, which obtains its legal force from Section 19 (2)(a) of the Planning and Compulsory Purchase Act 2004 (see paragraph 3.119 above), provides:

"...Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality." 20 (*Emphasis added*)

19 See Page 59-60 "Stage 2 Green Belt Review and Landscape Appraisal – Report" dated January 2016.

20 The "Town and Country Planning (Development Management Procedure) (England) Order 2015/595" and the Natural