

Appendix 6

Question 46 Part 3 of 3

Pages 3397 to 4888

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.²¹ 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18128
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>I strongly object to further development in Tring especially the Grove Fields/ Station road/ Marshcroft lane area. Q46 – Tring, TR-H1, TR-H2, TR-H3</p> <p>Development should be concentrated in Hemel Hempstead by building up in the town centre, adding more floors onto existing properties or demolishing sensitively, so as to preserve the character, and building higher to provide apartments especially for young people. Young people like to live in town centres and these properties would be cheaper for them than building large houses on green-field sites. Building higher in town centres is more sustainable because transport is concentrated in town centres which makes it more viable and so are other services such as jobs, schools, restaurants etc. Town centres are dying and this would help them be more vibrant.</p> <p>If you must add other sites, then the rest of Hemel should be expanded</p> <p>Summary Section from GFRA – Executive summary</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>

	GFRA full document attached
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18175
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>Development should be concentrated in Hemel Hempstead by building up in the town centre, adding more floors onto existing properties or demolishing sensitively, so as to preserve the character, and building higher to provide apartments especially for young people. Young people like to live in town centres and these properties would be cheaper for them than building large houses on green-field sites. Building higher in town centres is more sustainable because transport is concentrated in town centres which makes it more viable and so are other services such as jobs, schools, restaurants etc. Town centres are dying and this would help them be more vibrant.</p> <p>If you must add other sites, then the rest of Hemel should be expanded.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18177
Full Name	Peter and Cathy Davidson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Further opinions and ideas are given in Grove Fields Consultants report attached</p> <p>I strongly object to further development in Tring especially the Grove Fields/ Station road/ Marshcroft lane area.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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.²¹ 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18185
Full Name	Nicky and Dave Hulse
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 see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p>We are not against building houses in Tring to address a need, but feel that destroying our Green Belt land in order to do so would be a tragedy. The purpose of Green Belt is to be open land which benefits the community and this particular area is a haven to wildlife and is well used by walkers and other members of the community.</p> <p>Planning has already been given for 150 houses on Icknield Way, near the A41, but nothing has yet been built here. This should be taken into account when planning for future development and this site should be developed first</p> <p>Tring does not have the infrastructure to support such a large number of houses. Our schools are full, we have limited doctors surgeries and our last bank is closing on the high street. The roads are heaving with cars in Tring town centre and the car parks are full. There is no additional parking remaining at Tring Station and even the bike racks are full to bursting. We would have to address these infrastructure issues before considering building such a large number of houses here. We want Tring to remain 'a successful, compact market town' as detailed in the Core Strategy. People move to Tring because of it's compact nature and attractive countryside.</p> <p>There are other sites in Hemel Hempstead and Kings Langley that could be used to sustain new housing which would not impact on our countryside.</p> <p>Other areas such as Hemel Hempstead do have more infrastructure as well as employment opportunities and this should be borne in mind when allocating sites for development</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18232
Full Name	Nicky and Dave Hulse
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 see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p>There are other sites in Hemel Hempstead and Kings Langley that could be used to sustain new housing which would not impact on our countryside</p> <p>Other areas such as Hemel Hempstead do have more infrastructure as well as employment opportunities and this should be borne in mind when allocating sites for development</p> <p>GFRA Response to Question 46, full document attached to question 46</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</p>

	<p>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" (East Hemel Hempstead) 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	LPIO18234
Full Name	Nicky and Dave Hulse
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 see attached the Grove Fields Residents Association's responses to the proposed developments in Tring, which we concur with and of which we are a member</p> <p>We are not against building houses in Tring to address a need, but feel that destroying our Green Belt land in order to do so would be a tragedy. The purpose of Green Belt is to be open land which benefits the community and this particular area is a haven to wildlife and is well used by walkers and other members of the community</p> <p>Planning has already been given for 150 houses on Icknield Way, near the A41, but nothing has yet been built here. This should be taken into account when planning for future development and this site should be developed first.</p> <p>Tring does not have the infrastructure to support such a large number of houses. Our schools are full, we have</p>

limited doctors surgeries and our last bank is closing on the high street. The roads are heaving with cars in Tring town centre and the car parks are full. There is no additional parking remaining at Tring Station and even the bike racks are full to bursting. We would have to address these infrastructure issues before considering building such a large number of houses here. We want Tring to remain 'a successful, compact market town' as detailed in the Core Strategy. People move to Tring because of its compact nature and attractive countryside.

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.²¹ 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

	<p>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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18235
Full Name	Mr Richard Owens
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	4. There is relatively little opportunity for employment in Bovingdon; surely the emphasis for the Borough Council should be to make maximum use of land close to Hemel

	Hempstead, if possible near the industrial estate, where employment, access and facilities are optimal. I trust that Dacorum Council will take note of this and other submissions by Bovingdon residents
Include files	
Number	Question 46
ID	LPIO18237
Full Name	Mr Richard Owens
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 very concerned by the possible housing development in Bovingdon of up to 450 homes. I have lived in the village for 45 years and have seen more than our fair share of development in that time. Consequently, I should like to make the following points in relation to the new Local Plan.</p> <ol style="list-style-type: none"> 1 The development of 90 new homes has already been agreed. This represents an increase of approximately 5% of the total size of the village. The new plan could involve an additional 360 homes, thereby increasing the expansion to over 25%. This level of expansion can not be sustained by the current infrastructure, and the schooling, medical and traffic facilities would be totally inadequate for this increase in size. 2 The increase in traffic would be felt particularly in the village High Street, in Green Lane and on the Chesham Road. At school drop-off and pick-up times, the High Street is already heavily congested and with parking and buses in the road, it is already difficult to pass safely through the village. 3. The proposed developments appear to be opportunistic approaches by land owners More houses in Bovingdon would result in more commuters to places of work and a consequent heavy increase in traffic. 5. The atmosphere of the village environment would be un-balanced by aggressive development and Bovingdon would cease to be a village, but become more like a town <p>I trust that Dacorum Council will take note of this and other submissions by Bovingdon residents.</p>
Include files	
Number	Question 46
ID	LPIO18239
Full Name	Gail Skelton

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 as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.</p> <p>I have been resident in Berkhamsted for over 30 years and moved here just before having a family. I have therefore seen a great deal of changes and lived first hand with the growth and development of the town, along with my children. It had been a beautiful place to live and I have always felt privileged to do so. My children have thrived here.</p> <p>It therefore comes as some to concern to read of these latest developments.</p> <p>Originally I had two homes on the north side of Berkhamsted but have since moved and spent the last 6 years on the south side and even in that short time feel that the increase in traffic along Shootersway has changed the area considerably for the worse - both for volume and noise. It is also very dangerous since the nature of many of the roads do not even allow for walking and surely this is a basic need?</p> <p>I do appreciate that new homes need to be built but since the Darrs/Bells Lane proposal surely the town has taken its fair share of development and we need to respect that the infrastructure cannot sustain this any further.</p> <p>BRAG response to Question 46 (full document is attached)</p> <p>Question 46 <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 and 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

~~(which was undertaken by the DBC’s own Green Belt Review of ES 1 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

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. 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.
 - 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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Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18286
Full Name	Gail Skelton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

I am writing as a member and in support of BRAG to voice my concerns over the latest building proposal to my home town. However I have to confess that I usually have the cynical opinion that this will count for very little and to this extent, I sincerely hope that I am proved wrong.

. 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 (full document is attached)

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/2010/04/20/DBC-Advises-Review-of-Green-Belt-Review/)~~
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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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
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created by the site could add to existing problems in the AQMA at Northchurch

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 - 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"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18289
Full Name	Peter and Lucille Brooks
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 are writing to object to the proposal to build the maximum (option 3C) number of new homes in the Borough, with particular regard to the proposal to build on Rectory and Wayside Farms in Kings Langley.</p> <p>The reasons for us objecting are :</p> <p>Kings Valley village would lose it's individual identity and instead become an "urban sprawl";</p> <p>The Village does not have sufficient resources in terms of shopping, with a very inadequate small supermarket and little in the way of financial facilities such as a Building Society, which will lead to people driving to source these elsewhere adding to congestion and pollution;</p>

	<p>Existing Doctor and other Health surgeries would need enlarging;</p> <p>Likewise existing Primary and Secondary School's would need enlarging;</p> <p>The road network would struggle to cope. I attach two photos of <i>existing</i> congestion experienced every weekday morning after 0700 opposite one of the proposed sites at Wayside Farm which would result in traffic becoming "gridlocked";</p> <p>Public transport is poor, with the 500 bus route frequently delayed by traffic congestion elsewhere, and the demise of the 322 bus route completely. Rail passengers from Kings Langley frequently have to stand already on peak period train services which consist of two or three trains per hour;</p> <p>Hence we would urge the adoption and endorsement of the lower building figure option "1A".</p>
Include files	Peter and Lucille Brooks - photos.pdf
Number	Question 46
ID	LPIO18290
Full Name	Peter and Lucille Brooks
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 are writing to object to the proposal to build the maximum (option 3C) number of new homes in the Borough, with particular regard to the proposal to build on Rectory and Wayside Farms in Kings Langley.</p> <p>The reasons for us objecting are :</p> <p>Kings Valley village would lose it's individual identity and instead become an "urban sprawl";</p> <p>The Village does not have sufficient resources in terms of shopping, with a very inadequate small supermarket and little in the way of financial facilities such as a Building Society, which will lead to people driving to source these elsewhere adding to congestion and pollution;</p> <p>Existing Doctor and other Health surgeries would need enlarging;</p> <p>Likewise existing Primary and Secondary School's would need enlarging;</p> <p>The road network would struggle to cope. I attach two photos of <i>existing</i> congestion experienced every weekday morning after 0700 opposite one of the proposed sites at Wayside Farm which would result in traffic becoming "gridlocked";</p> <p>Public transport is poor, with the 500 bus route frequently delayed by traffic congestion elsewhere, and</p>

	<p>the demise of the 322 bus route completely. Rail passengers from Kings Langley frequently have to stand already on peak period train services which consist of two or three trains per hour;</p> <p>Hence we would urge the adoption and endorsement of the lower building figure option "1A".</p>
Include files	Peter and Lucille Brooks - photos.pdf
Number	Question 46
ID	LPIO18298
Full Name	Terry and Jennifer Elliott
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 are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>We are acutely aware of the need for AFFORDABLE new builds in our area . At present many sites in Tring are being infilled with 'superior , luxury 4/5 bedroomed houses, way out of the realms of our local inhabitants. These small developments have already put a strain on the local infrastructure:-</p> <p>No additional parking has been provided at the station, the car parks in Tring are overflowing at peak times, leading to on street parking, impeding the flow of traffic, parents are already having to take young children to the other side of Berkhamsted to access schools there, or having to split siblings when they have to attend different Tring primary schools.</p> <p>Even if in the proposed infrastructure, a new primary school were to be built, the situation at Tring Secondary school will become acute.</p> <p>The small industrial sites in Tring are already being built on. There will be fewer job opportunities in Tring as a result of this and the proposed developments of the garage site, the relocation of a major Tring employer, Grass Roots and the closure of two banks. Inevitably this will cause even more road congestion when Tring residents have to travel out of the town for work.</p> <p>We note that over the last few years Tring, Berkhamsted and the local villages have more than exceeded their planned percentage of building required, with no noticeable increase in infrastructure.</p> <p>Hemel Hempstead with its greater access to employment opportunities , better transport links to motorways, spare</p>

	<p>capacity in schools has NOT fulfilled its planning quota over the last few years .</p> <p>Therefore, it is our view that the focus of the proposed new housing quotas for the area should be centred on Hemel Hempstead.</p> <p>We support the building of approximately 500 new houses in Tring, because we believe that we should accept responsibility for some increase in population. This is a number, that should the proposed infrastructure not be provided (schools being the exception) that Tring could handle and would not greatly alter the fabric of the market town that we enjoy living in.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18345
Full Name	Terry and Jennifer Elliott
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 are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>We are acutely aware of the need for AFFORDABLE new builds in our area . At present many sites in Tring are being infilled with 'superior , luxury 4/5 bedroomed</p>

houses, way out of the realms of our local inhabitants. These small developments have already put a strain on the local infrastructure:-

No additional parking has been provided at the station, the car parks in Tring are overflowing at peak times, leading to on street parking, impeding the flow of traffic, parents are already having to take young children to the other side of Berkhamsted to access schools there, or having to split siblings when they have to attend different Tring primary schools.

Even if in the proposed infrastructure, a new primary school were to be built, the situation at Tring Secondary school will become acute.

The small industrial sites in Tring are already being built on. There will be fewer job opportunities in Tring as a result of this and the proposed developments of the garage site, the relocation of a major Tring employer, Grass Roots and the closure of two banks. Inevitably this will cause even more road congestion when Tring residents have to travel out of the town for work.

We note that over the last few years Tring, Berkhamsted and the local villages have more than exceeded their planned percentage of building required, with no noticeable increase in infrastructure.

Hemel Hempstead with its greater access to employment opportunities , better transport links to motorways, spare capacity in schools has NOT fulfilled its planning quota over the last few years .

Therefore, it is our view that the focus of the proposed new housing quotas for the area should be centred on Hemel Hempstead.

We support the building of approximately 500 new houses in Tring, because we believe that we should accept responsibility for some increase in population This is a number, that should the proposed infrastructure not be provided (schools being the exception) that Tring could handle and would not greatly alter the fabric of the market town that we enjoy living in.

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

	<p>"...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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO18347
Full Name	Terry and Jennifer Elliott
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 are members of the Grove Fields Residents Association and as such support their recommendations.</p> <p>We are writing in our own capacity as long term residents, (one of us being a local teacher for over 30 years), to add our personal comments regarding the proposed increase in housing in Tring, as a result of the published Strategic Planning Options for the area.</p> <p>We are acutely aware of the need for AFFORDABLE new builds in our area . At present many sites in Tring are being infilled with 'superior , luxury 4/5 bedroomed houses, way out of the realms of our local inhabitants. These small developments have already put a strain on the local infrastructure:-</p> <p>No additional parking has been provided at the station, the car parks in Tring are overflowing at peak times, leading to on street parking, impeding the flow of traffic, parents are already having to take young children to the other side of Berkhamsted to access schools there, or having to split siblings when they have to attend different Tring primary schools.</p> <p>Even if in the proposed infrastructure, a new primary school were to be built, the situation at Tring Secondary school will become acute.</p>

The small industrial sites in Tring are already being built on. There will be fewer job opportunities in Tring as a result of this and the proposed developments of the garage site, the relocation of a major Tring employer, Grass Roots and the closure of two banks. Inevitably this will cause even more road congestion when Tring residents have to travel out of the town for work.

We note that over the last few years Tring, Berkhamsted and the local villages have more than exceeded their planned percentage of building required, with no noticeable increase in infrastructure.

Hemel Hempstead with its greater access to employment opportunities, better transport links to motorways, spare capacity in schools has NOT fulfilled its planning quota over the last few years.

Therefore, it is our view that the focus of the proposed new housing quotas for the area should be centred on Hemel Hempstead.

We support the building of approximately 500 new houses in Tring, because we believe that we should accept responsibility for some increase in population. This is a number, that should the proposed infrastructure not be provided (schools being the exception) that Tring could handle and would not greatly alter the fabric of the market town that we enjoy living in.

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.²¹ 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 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	LPIO18353
Full Name	Plato Property Investments LLP
Company / Organisation	Plato Property Investments LLP

Position	C/O Aitchison Rafferty
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This Statement has been prepared to respond to the questions set out in the Issues and Options Consultation published by the Council in November 2017. It is submitted on behalf of Plato Property investments LLP in respect of a site located to the south east of the Mini dealership at London Road, Cow Roast HP23 5RE.</p> <p>This Statement should be read along with the Planning Statement attached at Appendix 1 (see Q 46 for attachment) which sets out the detailed planning case in support of the allocation of the site for housing in the emerging Local Plan.</p> <p>In summary, we consider that:</p> <p>The Council should choose the highest level of growth for Dacorum, to seek to address the pressing need for new homes that exists in the Borough</p> <p>There is a need for new canal moorings for both residential and tourist uses, and the proposed site to the land to south east of Mini Dealership, London Road, Cow Roast offers an opportunity to provide such a facility, as part of a mixed use development.</p> <p>The proposed housing site to the south east of Mini Dealership, London Road, is considered to be one of the more sustainable locations within the 'Rest of the Borough'. It is on the edge of the existing built up area, adjacent to a village pub, a local shop and employment opportunities, is well served by bus routes and also offers the ability to cycle safely along the tow path. It is also much close to the larger settlements of Berkhamsted and Tring than other settlements in the rural area.</p> <p>The site has a capacity to provide a mixed used development of up to 28 new homes, in an attractive design sympathetic to its canal side setting incorporating canal boat moorings at a more sustainable location within the Rural Area compared to other smaller settlement, and would provide a significant contribution to local housing need.</p> <p>See attached</p>
Include files	James Holmes Plato Property Investments LLP - Call for Sites (4 Dec 2017).pdf
Number	Question 46
ID	LPIO18370
Full Name	Sharon van Vlymen
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB. • Developing the site will remove <u>all</u> Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt

and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.

- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

3. Road Access

3.1 As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents’ parking and its junction with Gravel Path.

3.4 As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

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5. Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns

	<p>AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).</p> <p>We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LP1018372
Full Name	Mr & Mrs Thew
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more

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1 Recommendations

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18374
Full Name	Mr & Mrs Mitchell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

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We note that:

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Include files	
Number	Question 46
ID	LPIO18376
Full Name	Mr & Mrs Hodkinson
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

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1 Recommendations

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18378
Full Name	Mr & Mrs Drake
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB. • Developing the site will remove <u>all</u> Green Belt in this valley – there will no longer be any boundary

to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.

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1 Road Access

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3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

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Include files	
Number	Question 46
ID	LPIO18380
Full Name	Mr & Mrs Calderwood
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report

(September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

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Include files	
Number	Question 46
ID	LPIO18382
Full Name	Mr & Mrs Odell

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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

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
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Include files	
Number	Question 46
ID	LPIO18384
Full Name	Mr & Mrs Mehew
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside

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1 Recommendations

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files

Number	Question 46
ID	LPIO18386
Full Name	Mr & Mrs Bone
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p>

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- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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Include files	
Number	Question 46
ID	LPIO18388
Full Name	Mr & Mrs Green
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p>

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	<p>Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LPIO18390
Full Name	Mr & Mrs Graham
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

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Include files	
Number	Question 46
ID	LPIO18392
Full Name	Mr & Mrs Clark
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum’s Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development

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Include files	
Number	Question 46
ID	LPIO18394
Full Name	Mr & Mrs Langley
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending

the boundary in view of the harm that would be caused to the openness of the wider Green Belt.

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18396
Full Name	Mr & Mrs Wood
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
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- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
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Include files	
Number	Question 46
ID	LPIO18398
Full Name	Mr & Mrs Patel
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

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The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18400
Full Name	Mr & Mrs Jones
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB. • Developing the site will remove <u>all</u> Green Belt in this valley – there will no longer be any boundary

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Include files	
Number	Question 46
ID	LPIO18402
Full Name	Mr & Mrs Ash-Noble
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report

(September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

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- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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mean removing the trees and hedges that screen their houses from the AONB.

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18404
Full Name	Mr & Mrs Pitcher

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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

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Include files	
Number	Question 46
ID	LPIO18406
Full Name	Mr & Mrs Roussel
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside

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Include files

Number	Question 46
ID	LPIO18408
Full Name	Mr & Mrs Massingale
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p>

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seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

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3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

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4.1 The Core Strategy has policies for a mix of housing and for 35% of new houses to be "affordable". These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a

	<p>minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).</p> <p>4.2 We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.</p> <p>1 Recommendations</p> <p>Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).</p> <p>We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LPIO18410
Full Name	Mr & Mrs Jenkinson
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p>

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
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- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt and the creation of "defensible boundaries" is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

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1 Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).

We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council

	<p>Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LPIO18412
Full Name	Mr & Mrs Shelly
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

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Include files	
Number	Question 46
ID	LPIO18414
Full Name	Mr & Mrs Hocken
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum’s Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development

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We note that:

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Include files	
Number	Question 46
ID	LPIO18416
Full Name	Mr & Mrs Callaghan
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending

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3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

3.4 As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

3.5 In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

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3.6 The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

3.8 Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that

walking (or cycling) is impractical, and so additional parking will be required in the town.

1 Housing and Community Services Strategic Objective

4.1 The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).

4.2 We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

1 Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).

We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18418
Full Name	Mr & Mrs Hill
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt and the creation of "defensible boundaries" is given

any weight then the Green Belt area to the south of Castle Village will be put at risk.

- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

1 Road Access

3.1 As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

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3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

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1 Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the

	<p>objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).</p> <p>We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LPIO18420
Full Name	Mr & Mrs Radakovic
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
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- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

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1 Recommendations

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18422
Full Name	Mr & Mrs Bryant
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB. • Developing the site will remove <u>all</u> Green Belt in this valley – there will no longer be any boundary

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Include files	
Number	Question 46
ID	LPIO18424
Full Name	Mr Lamb
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report

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3.1 As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would

mean removing the trees and hedges that screen their houses from the AONB.

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Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

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1 Recommendations

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18426
Full Name	Mr & Mrs Phillips

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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

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Include files	
Number	Question 46
ID	LPIO18428
Full Name	Mr & Mrs Howe
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside

from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
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- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files

Number	Question 46
ID	LPIO18430
Full Name	Mr & Mrs Peachey
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p>

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Include files	
Number	Question 46
ID	LPIO18432
Full Name	Mr & Mrs Fairbrother
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p>

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- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

1 Road Access

3.1 As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

3.4 As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

3.5 In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

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traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

3.8 Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

1 Housing and Community Services Strategic Objective

4.1 The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).

4.2 We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

1 Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).

We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council

	<p>Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LPIO18434
Full Name	Mrs Browning
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

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- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

1 Road Access

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single lane due to residents' parking and its junction with Gravel Path.

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Include files	
Number	Question 46
ID	LPIO18436
Full Name	Mr & Mrs Thomson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum’s Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development

would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt and the creation of "defensible boundaries" is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

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Include files	
Number	Question 46
ID	LPIO18438
Full Name	Mr & Mrs Lawlor
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18440
Full Name	Mr & Mrs Tangye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

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Include files	
Number	Question 46
ID	LPIO18442
Full Name	Mr Margrave
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

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We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO18444
Full Name	Mr & Mrs Hipgrave
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process <u>and with the support of local people</u> (Mr Lewis's emphasis). We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB. • Developing the site will remove <u>all</u> Green Belt in this valley – there will no longer be any boundary

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Include files	
Number	Question 46
ID	LPIO18446
Full Name	Mr & Mrs Domoney
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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment. We note that:</p> <ul style="list-style-type: none"> Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report

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Include files	
Number	Question 46
ID	LPIO18448
Full Name	Mr & Mrs Haw

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 are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.</p> <p>1 Conserving the Green Belt and CAONB</p> <p>The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.</p> <p>We note that:</p> <ul style="list-style-type: none"> • Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east. • As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt. • This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed: <p><i>The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.</i></p> <ul style="list-style-type: none"> • The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

opens out and is not visually intrusive into the AONB.

- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

1 Road Access

3.1 As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents’ parking and its junction with Gravel Path.

3.4 As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway

with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

3.5 In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

3.6 The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

3.8 Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

1 Housing and Community Services Strategic Objective

4.1 The Core Strategy has policies for a mix of housing and for 35% of new houses to be "affordable". These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).

4.2 We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These

	<p>suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.</p> <p>1 Recommendations</p> <p>Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).</p> <p>We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it.</p> <p>The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.</p>
Include files	
Number	Question 46
ID	LPIO18513
Full Name	Melanine Llewellyn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Question 46 <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>Yes</p> <p>General Comment:</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 and 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.berkhamsted.gov.uk/DBC%20Green%20Belt%20Review%20Map> 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

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

- 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.

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

- 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

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

- 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.

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

- 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"> 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	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18560
Full Name	Mrs Juliet Chodzko
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 should like to add my name to the issues put forward in the attached (BRAG Response). I feel that the special needs of Berkhamsted have not been considered properly.</p> <p>Question 46 <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 and 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</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

~~(https://www.stalbans.gov.uk/2017/04/13/dbc-claims-green-belt-review-should~~

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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 - Noise from railway
 - Distance from town centre services and vital facilities
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- 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
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 - 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
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Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18606
Full Name	Captain Andrew Cassels
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 entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>Question 46 <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 and 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 & 2) that has proved to be a deeply flawed process (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 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.</p>

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

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

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- 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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Number	Question 46
ID	LPIO18652
Full Name	Lindy Weinreb
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>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>Yes</p> <p>General Comment:</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> <p>There are several issues that have not been addressed before sites are identified –</p> <ul style="list-style-type: none"> • 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 <p>THE REASON I HAVE NOT COMMENTED ON THE INDIVIDUAL SITES WITHIN BERKHAMSTED IS THAT AS THE ANSWERS TO MY OTHER QUESTIONS HAVE INDICATED WE CANNOT TAKE ANY MORE DEVELOPMENT FOR THE REASONS I HAVE STATED – WE NEED A NEW CAMPAIGN WITI – WHERE IS THE INFRASTRUCTURE?</p>

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.

9. BIODIVERSITY

Policy 96 of the Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local distinctiveness of the ecology of the area. Policy 102 deals specifically with sites of importance to nature conservation. PPS 9 also deals with biodiversity A Technical Study on Nature Conservation has been carried out in preparation for the Local Development Framework by Herts. Biological Research Centre [2006]. In addition to identifying major Biodiversity Sites, the work has identified important Biodiversity Corridors. While we appreciate that such sites and corridors are not protected by statute we feel their protection should form an important part of any assessment of housing site suitability as should the protection of 'Wildspace' more generally given its rapidly disappearing availability in Berkhamsted. The constant removal of local habitat and resources is degrading and removing the ability for biodiversity to function ecologically within the urban environment and this is of grave concern.

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

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

Include files	
Number	Question 46
ID	LPIO18699
Full Name	Hilary Abbott

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 & 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. 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>Question 46 <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 and 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 & 2) that has proved to be a deeply flawed process</p> <p><small>© Crown Copyright and Database Right 2018. All Rights Reserved. TFS</small></p>

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 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 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,

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- 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

	<ul style="list-style-type: none"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18745
Full Name	Paul and Gillian Jenkins
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 & 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, 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</p>

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

~~(as follows: [http://www.stalban.co.uk/press/2013/04/24/DBC-Advises-on-Review-of-Green-Belt-in-St-Alban-1](#))~~
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
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- 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
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	<p>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>
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18791
Full Name	Berkhamsted Citizens
Company / Organisation	Berkhamsted Citizens
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>Yes</p> <p>General Comment:</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> <p>There are several issues that have not been addressed before sites are identified –</p> <ul style="list-style-type: none"> • 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 <p>Below are the exact comments we made to the 2008 consultation and actually, very little has changed –</p> <ul style="list-style-type: none"> • Future development of Berkhamsted should be Plan led and be driven by the needs of the local community.

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

KEY PRINCIPLES

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

1. PLAN LED DEVELOPMENT

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

2. COMMUNITY NEEDS DRIVEN

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

3. THE CHARACTER OF THE TOWN

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

A. The Rural Surrounds and Gateway

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

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

The impact of proposed sites on the rural gateway to Berkhamsted, AONB and our semi-rural environment thus forms an important part of our assessment.

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

B. The Conservation Area within

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

character of the Townscape as well as existing community facilities.

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

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

4. INFRASTRUCTURE

Any further housing provision should take into account an assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required. (PPS 3) The infrastructure of the Town is not fit for purpose in relation to current needs let alone any future housing development. Utilities such as electricity and sewage capacity are under constant pressure as evidenced by power cuts and raw sewage which is not an uncommon phenomenon in Bank Mill Lane, the High Street, London Road or even Coppins Close. Our roads are permanently congested with the parked cars of both residents and commuters. Many are unsuitable for heavy traffic and public transport. Our high street is the only focal point for shopping and is now under severe strain from increased through traffic and inadequate parking space. Any solution to these problems will require significant investment. In our view, these problems need urgent attention now. What then will be the impact of any new development? We recommend that, if it is necessary to allow any future housing provision in the town, this should be phased in such a way as to require that any necessary infrastructure should be provided before such developments are permitted to take place.

5. TRANSPORT, CARS, CYCLES AND PEDESTRIANS

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

development would have to be self-supporting in terms of infrastructure and its implications for Berkhamsted as a whole critically assessed given the issues which exist already.

6. COMMUNITY AND SOCIAL FACILITIES

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

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

7. OPEN SPACE

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

8. INFILLING

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

We would encourage Dacorum to adopt separate policies for residential brownfield land which would effectively restrict, and in some cases, prohibit, new housing development on such sites.

These Policies would contain some of the following important elements:

- remove the need to maximise the use of land in residential gardens e.g. by not amalgamating gardens into larger units
- emphasis on the need to consult with neighbours before developers bring forward proposals

- prevent pre-application tree felling by more extensive use of TPO's and ecological surveys
- set low density figures and stick to them in determining planning decisions
- importance of design compatibility with adjoining properties
- infrastructure suitability

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

9. **BIODIVERSITY**

Policy 96 of the Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local distinctiveness of the ecology of the area. Policy 102 deals specifically with sites of importance to nature conservation. PPS 9 also deals with biodiversity A Technical Study on Nature Conservation has been carried out in preparation for the Local Development Framework by Herts. Biological Research Centre [2006]. In addition to identifying major Biodiversity Sites, the work has identified important Biodiversity Corridors. While we appreciate that such sites and corridors are not protected by statute we feel their protection should form an important part of any assessment of housing site suitability as should the protection of 'Wildspace' more generally given its rapidly disappearing availability in Berkhamsted. The constant removal of local habitat and resources is degrading and removing the ability for biodiversity to function ecologically within the urban environment and this is of grave concern.

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

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

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

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

Include files	Berkhamsted Citizens Response (DBC Strategic Plan).pdf
Number	Question 46
ID	LPIO18840
Full Name	Lyndsay Slater

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 & 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. 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>Question 46 <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 and 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 & 2) that has proved to be a deeply flawed process</p> <p><small>© Crown Copyright and Database Right 2014. All Rights Reserved. TSO (UK) Ltd. 07062 25577. www.tsouserVICES.co.uk</small></p>

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 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 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

	<ul style="list-style-type: none"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18842
Full Name	Andrew and Margit Dobbie
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 & 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. 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</p>

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 (full document is attached)

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 and Hemel Hempstead (stages 1 & 2) which was published in 2014 and which did not include 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.
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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 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
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- 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
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- 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

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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
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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
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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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	<p>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>
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18932
Full Name	Katherine Cassels
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 entirely agree with all responses given by BRAG (Berkhamsted Residents Action Group).</p> <p>...</p> <p>Question 46 <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 and 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
~~(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 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 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
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 - Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to

see a cyclist, especially ascending 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

	<ul style="list-style-type: none"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO18933
Full Name	Karen Bramhall-Allan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I am writing this letter to object to the plans to build even more homes in and surrounding the historic village of Kings Langley, our village is irreplaceable dating back to the 11th Century, it's a vibrant community now struggling to cope with the increased traffic going through the village due to all the new developments already here.

	<p>The level of traffic going through our High street, especially at main commuter times/school times is dangerous and now it seems to be heavy all day, we already have a bypass and other roads in the area are equally congested, Red Lion lane is nearly impassable due to cars that cannot park in the new development that has been built. To get to the M25/Watford/Apsley is a thing you would avoid at all cost if you could, but most of us need to drop the kids off or go to work.</p> <p>You seem intent on destroying our lovely historic village, something that cannot be replaced, with a coalescence of Hemel/Watford/Abbots Langley just another sprawling suburb around London is something we do need, and just to mention something else you got wrong Shendish Manor is part of Kings Langley not Hemel.</p> <p>Please think again, our historic village needs protection not annihilation.</p>
Include files	
Number	Question 46
ID	LPIO18934
Full Name	Karen Bramhall-Allan
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Shendish Manor is part of Kings Langley not Hemel.
Include files	
Number	Question 46
ID	LPIO18956
Full Name	Rupert Symmons
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>KL-h1</p> <p>We are opposed to the loss of green belt.</p> <p>The infrastructure enhancements proposed by the promoter are not sufficient to address the wider infrastructure concerns</p> <p>KL-h2</p> <p>The site is located on a flood plain</p> <p>We are opposed to the loss of green belt.</p>

	<p>KL-h3</p> <p>The current site area is a heavily used local amenity area – used by local people and others from further afield.</p> <p>The site current house one of only two working dairy farms in the local area; the farm contributes to the local area and provides an educational function as well as local, sustainable produce.</p> <p>The area is located on the greenbelt and its development will expand the Village boundaries to an unacceptable level.</p> <p>There are two sites of historic/archaeological interest on the identified site that could be harmed.</p> <p>Part of the site is located on a flood plain.</p> <p>Develop of this site will result in a loss of character to the village and local conservation area.</p> <p>The appraisal document identifies part of the site for possible commercial development due to its proximity to the station; however there is no demand for commercial building in this area. This is demonstrated by the empty commercial buildings on Station Approach and the Lower Road and the recent change of use consents granted on the vacant commercial buildings (i.e. West Herts College and Galliard Homes developments)</p> <p>The southern part of the site is very close to the M25 and A41 bypass – possible impacts on the health and wellbeing of those living there.</p> <p>The main towns in the borough are better able to cope with expansion.</p> <p>The level of development proposed will require significant investment in social and transport infrastructure and result in a significant increase in traffic to the local area.</p> <p>The site area currently has significant changes in level.</p>
Include files	
Number	Question 46
ID	LPIO18964
Full Name	Mrs Emma Robertson
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 attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>Summary Section from GFRA – Executive summary</p> <p>Overall it is considered that the proportion of houses that can be considered to be responsible allocation within</p>

	<p>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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19011
Full Name	Mrs Emma Robertson
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 attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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 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".

Q9 – Tick NO

GFRA Response to Question 9, full document attached to question 46

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 process¹⁷.

- 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

Q46 – Tick YES - OFFICER COMMENT – Green Belt Review, Tring, Tr-h1, Tr-h2, Tr-h3, Tr-h4, Tr-h5, Tr-h6 - GFRA

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.²¹ 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 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	LPIO19012
Full Name	Mr Norman Allan
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 this letter to object to the plans to build homes in and surrounding Kings Langley. This seriously is creating coalescence on a number of our boundaries and is a betrayal of the Green Belt principle purpose.</p> <p>This is not just a “NIMBY - Not in my back yard” response as I believe it is a travesty that you are considering so many attacks on the green belt. The green belt was established to stop exactly what you are planning. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land PERMANENTLY open, and consequently the most important attribute of green belts is their openness.</p> <p>I believe the whole report is designed around removing barriers to developing green belt and making it as difficult as possible for the public to object. It is estimated that 70% of the cost of new housing is the land and therefore it is not difficult to see huge financial gain for a few individuals at stake. To ask the public to go through 100’s of pages of technical analysis which in most cases appears to be a convoluted way of expressing an opinion rather than producing real facts.</p> <p>In addition the idea that detailed infrastructure plans will come later is ludicrous.</p> <p>The latest round of brown field developments in the area have generated a number of problems. Having temporarily lived in a 4 bedroom townhouse in Apsley lock with a garage capable of holding a motorbike! The gap between the parking arrangements provided by the planners and the actual needs of the residents was farcical and a major cause of stress. As the project has moved along towards Red Lion Lane it is easy to see with the parking on the street that this has not improved.</p> <p>The A4251 that was the A41 before the Hemel Hempstead bypass stretch opened is busier and busier with current level of housing growth. The queue to get on the M25 in a morning is developing earlier and lasting longer by the day.</p> <p>All of the proposers have put in claims of considering new schools, health facilities, community facilities and road improvements. This would appear to be a tick box exercise to score positively and has no real substance. They are easy words that can be walked away from once change of use is granted.</p>

	The bottleneck of Kings Langley village cannot be removed without destroying the character of the community and the ridiculous focus putting the main hospital for the area so far out of the way in Watford is endangering everybody in Dacorum. We did have a real hospital in Hemel Hempstead that ambulances could get to.
Include files	
Number	Question 46
ID	LPIO19014
Full Name	Caroline Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Concerning the building of new homes in Dacorum, I support Option 1 Section A.</p> <p>This does not include Shendish, which is not in Hemel Hempstead but Kings Langley.</p> <p>I am opposed to the proposed building of any more houses than 603 houses and in particular to building in Kings langley and on Green Belt.</p> <p>My main objections are as follows</p> <ol style="list-style-type: none"> 1 The complete loss of the "village" . The boundaries of Kings Langley would coalesce into Apsley and Hemel hempstead , and completely lose its character as a village. 2 The road networks are already very heavy. It takes half an hour at busy times to drive to Kings langley station (to get to London). This would become impossible. <p>We already have a by-pass and this is already solid with stationary traffic at peak times, feeding the M25 and M1. Inevitably an average of one person in each new household would work in london.</p> <p>Traffic in the other direction going from Kings langley to Hemel and to the sports centre at box moor and the Magic roundabout is extremely slow and heavy in the rush hour and after school drop off and pick up.</p> <ol style="list-style-type: none"> 1 The train line to London would become impossible , in terms of places on the train, and traffic to the station. <p>4. The nearest A and E is Watford. This is already too far and too slow (re traffic) and would be dangerously unviable with massive building in Kings langley.</p> <p>5. Wayside farm is one of only 2 jersey herds in the county. It would be a great shame to lose it.</p>

	6.Losing Wayside farm and Rectory farm would lose forever green spaces and areas of great beauty for us and our children.
Include files	
Number	Question 46
ID	LPIO19015
Full Name	Caroline Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Concerning the building of new homes in Dacorum, I support Option 1 Section A.</p> <p>This does not include Shendish, which is not in Hemel Hempstead but Kings Langley.</p> <p>I am opposed to the proposed building of any more houses than 603 houses and in particular to building in Kings Langley and on Green Belt.</p> <p>My main objections are as follows</p> <ol style="list-style-type: none"> 1 The complete loss of the "village" . The boundaries of Kings Langley would coalesce into Apsley and Hemel Hempstead , and completely lose its character as a village. 2 The road networks are already very heavy. It takes half an hour at busy times to drive to Kings Langley station (to get to London). This would become impossible. <p>We already have a by-pass and this is already solid with stationary traffic at peak times, feeding the M25 and M1. Inevitably an average of one person in each new household would work in London.</p> <p>Traffic in the other direction going from Kings Langley to Hemel and to the sports centre at Box Moor and the Magic roundabout is extremely slow and heavy in the rush hour and after school drop off and pick up.</p> <ol style="list-style-type: none"> 1 The train line to London would become impossible , in terms of places on the train, and traffic to the station. <p>4. The nearest A and E is Watford. This is already too far and too slow (re traffic) and would be dangerously unviable with massive building in Kings Langley.</p> <p>5. Wayside farm is one of only 2 Jersey herds in the county. It would be a great shame to lose it.</p> <p>6. Losing Wayside farm and Rectory farm would lose forever green spaces and areas of great beauty for us and our children.</p>
Include files	
Number	Question 46
ID	LPIO19016

Full Name	Caroline Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Losing Wayside farm and Rectory farm would lose forever green spaces and areas of great beauty for us and our children.
Include files	
Number	Question 46
ID	LPIO19017
Full Name	Caroline Howard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Wayside farm is one of only 2 jersey herds in the county. It would be a great shame to lose it. Losing Wayside farm and Rectory farm would lose forever green spaces and areas of great beauty for us and our children.
Include files	
Number	Question 46
ID	LPIO19018
Full Name	Mrs Stephanie Graber
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Prtotesting about building planned at KLangley on greenbelt sites.
Include files	
Number	Question 46
ID	LPIO19019
Full Name	Mr Phil Cheetham
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Green belt land should be preserved and where there is insufficient brownfield sites then only as a last resort should green belt be considered. When it is considered a last resort, the area has to be able to sustain an increase in population and anyone who lives in Kings Langley knows that we are already at capacity for schools, traffic etc and you only need to look at what happened with Apsley to realise what a mess allowing development to happen where the infrastructure can't support it has.</p> <p>The traffic through Kings Langley is already far too high, the schools are oversubscribed, parking is a major issue, the trains are full morning and night and developers keep wanting to redevelop or build on sites but make nowhere near enough provision for parking and Dacorum Planning are letting them do it. On page 47 of the plan it states Kings Langley has the capacity to only build a further 50 houses and that is because it is already full. You cannot just build on land because it is there and not consider the impact it would have on the local community when it is already at capacity.</p> <p>The Government plans that were announced on February 7th clearly state:</p> <ul style="list-style-type: none"> - Ministers have reaffirmed this government's commitment to the green belt – that only in exceptional circumstances may councils alter green belt boundaries after consulting local people and submitting the revised Local Plan for examination, and set out for the first time all the actions local authorities must take before considering the green belt. - The plan for 'Urban Regeneration' includes: strengthening national planning policy to create a 'de facto' presumption in favour of housing on suitable brownfield land and to drive up density levels in high demand areas while ensuring that developments are well-designed and respect the character of the local area. <p>People live in Kings Langley to enjoy some of the protected greenbelt rather than live in urban communities such as Hemel Hempstead. If the plans to build on greenbelt are adopted then a historic village would become an extension of Hemel Hempstead. The bold copy above shows why building on greenbelt in Kings Langley does not fit with government policy.</p> <p>If this plan was to proceed the preferred option would be 1A.</p>
Include files	
Number	Question 46
ID	LPIO19021
Full Name	Keith Shaw
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 should point out that my family have lived in Berkhamsted for three generation and are well embedded into the preservation of the precious Chilterns landscape and historic lineage going back nearly 1000 years. Our Victorian forefathers did not know better when they sliced off the side of the castle motte and bailey , then in the 1960s planning decisions resulted in building the latest cheap inappropriate shops around the Boots area in the High Street, while the planners have been inept at influencing Railtracks ghastly sub station in the front of our station car park. It does not seem that Dacorum Planners realise what a special place Berkahmsted is in its built and natural environment. Within Berkhamsted we should be rebuilding brownfield land and ensuring that open space and recreational land is retained for future generations, especially as we have less than half that type of land associated with a town of this size.</p> <p>The proposed sites for development in Berkhamsted will cram the south side of the town and will ultimately expand the town by 25%, which presently has a village feel to it, with its services currently running at bursting point. Road transport is often stationary in the town, schools are over subscribed and it's difficult to get a doctor or dentist appointment. The access streets to development sites are often single track or run as single track e.g. Darrs lane, Ivy House Lane, George Street.</p> <p>Major developments and the lions share of development should be centred in Hemel Hempstead new town which has the infrastructure to cope with and manage such new development. Consequently, the new Local Plan should be limited to Option 1B which will enable Berkhamsted to be a special place in the Chilterns and Hertfordshire alongside St Albans and Harpenden.</p>
Include files	
Number	Question 46
ID	LPIO19023
Full Name	Beverly Hope
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 oppose any plans to build any houses, nursing homes etc. in Bovingdon.</p> <p>The village is already at total capacity and can hardly cope as it is. Doctors and Dentists are full as is the local</p>

	<p>school. There are also not enough infrastructures in place to deal with the increased capacity of Cars and People. There is no Fire Station anymore and the parking and congestion in the Village is nearing danger levels. There was a serious accident in the village last year when a car overturned in the High Street.</p> <p>Primarily, it is Green Belt land and it does conflict with Dacorum's Core Strategy to minimise impact on Green Belt. We realize that you are under pressure to build but a tiny village is not a good starting point. There are larger towns nearby with more facilities in place for New Houses.</p> <p>I hope you will consider these points and reassess the areas where you build.</p>
Include files	
Number	Question 46
ID	LPIO19027
Full Name	Mr Peter Durman
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My detailed objection to the expansion of Bovingdon village beyond the previously planned 90 or so houses yet to be built are as follows.</p> <p>1.0 Green belt development</p> <p>Under the plan up to 450 houses involves the taking of green belt land. This clearly conflicts with Dacorum's core strategy to ' minimise impact on Green Belt' The taking of green belt land should not be considered just because it has been offered which appears to be the case. It should only be considered when brownfield land within the borough has been exhausted</p> <p>2.0 Infrastructure</p> <p>2.1 Roads</p> <p>The main road into Bovingdon between Chesham and Hemel Hempstead is already the busiest in Hertfordshire. Adding up to 25% more housing into Bovingdon will place unacceptable additional strain on this vital link. There are few employment opportunities in the village meaning most of the population travel along this and other roads to rail and main road links expanding the village will draw in more people who use these links creating more journeys along already overcrowded roads.</p> <p>Roads within Bovingdon are already oversubscribed. In particular the High Street is dangerously overcrowded with no traffic calming or management. Additional housing will generate the same proportion of additional traffic IE: 25%. The main roads within Bovingdon will be</p>

unpleasant and dangerous places to live, drive, cycle and walk.

2.2 Parking

Bovingdon centre has on-road/pavement parking with no separate parking areas. Parking around the High Street to service the shops is already inadequate and interferes with the traffic flow causing congestion and is frankly dangerous when the village is busy. The village has its school near most of the shops in the High Street the transportation of children from the outskirts, hamlets and lanes around the village creates further parking needs as does shopping trips from these communities that use the village. Minor accidents are frequent. 25% additional is not sustainable and beyond dangerous without a dedicated car park on or near the high street available for school drop off and pick up as servicing the shops.

2.3 School

The school has no further capacity and no room to expand further

2.4 Doctors/ dentists

These services are also close to capacity

2.5 Drainage

Bovingdon has endemic issues with surface water drainage. Recent flooding at the junction of Green Lane and High Street and elsewhere in the village is but the latest of a long list of incidents demonstrating that infrastructure improvements are needed without addition housing and would be more frequent with additional housing in the Green Lane area in particular.

Summary of reasoning for no further development of Bovingdon village.

The combination of loss of green belt land, limitations of infrastructure, and community services at or near capacity means that the village cannot support additional housing beyond the 90 or so already agreed in previous plans and yet to be built. To contemplate up to 450 houses would require a large investment in infrastructure and would have a negative impact on the quality of life in a village community already close to capacity. For that reason I would only support option 2b which provides the housing required by the area but sites them where the transport infrastructure is available and close to the opportunities for work, schooling and other essential services. Siting housing close to where most members of the household need to travel to on a daily basis makes sense in terms of carbon footprint, quality of life and convenience.

Include files	
Number	Question 46
ID	LPIO19028
Full Name	Mr Sunil Sharma
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 object to Daocum's New Local Plan for the following reason.</p> <p>The existing infrastructure within the area is already insufficient for the current population density. Examples of where the infrastructure is stretched can be seen on a daily basis and are as follows:</p> <ul style="list-style-type: none"> • To many cars on the road, making parking difficult. • To much traffic, especially at peak times in Kings Langley and Apsley. • To few trains running per hour meaning that the trains are often overcrowded. • To few places for children in the local schools. Which is evident when children from kings Langley can't get places in the local primary school. <p>As someone who moved to Kings Langley from London I have seen the situation degrade over the last 10 years. This is without additional homes being built and the people and cars that this will bring to the area. Kings Langley is now worse than many suburban areas within the M25 where the infrastructure is already in place to cope with a higher population density.</p>
Include files	
Number	Question 46
ID	LPIO19074
Full Name	Barbara Gainsley
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 attended the meeting of Berkhamsted Citizens, and my views are reflected in the conclusions we came to on the night, and our concerns about the proposed development.</p> <p>Berkhamsted is a town in a valley, it is limited by its geography, and also hugely limited by its resources and infrastructure.</p> <p>Please accept this email as my response to the proposal, I am in complete agreement with these concerns voiced by our Citizens.</p> <p>General Comment:</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</p>

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 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

-

1 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.

1 **BIODIVERSITY**

Policy 96 of the Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local distinctiveness of the ecology of the area. Policy 102 deals specifically with sites of importance to nature conservation. PPS 9 also deals with biodiversity A Technical Study on Nature Conservation has been carried out in preparation for the Local Development Framework by Herts. Biological Research Centre [2006]. In addition to identifying major Biodiversity Sites, the work has identified important Biodiversity Corridors. While we appreciate that such sites and corridors are not protected by statute we feel their protection should form an important part of any assessment of housing site suitability as should the protection of 'Wildspace' more generally given its rapidly disappearing availability in Berkhamsted. The constant removal of local habitat and resources is degrading and removing the ability for biodiversity to function ecologically within the urban environment and this is of grave concern.

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

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

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

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

Include files

Number	Question 46
ID	LPIO19075
Full Name	Mrs Emma Robertson
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 attached the final report written on behalf of Grove Field Residents Association. It states what we believe to be the best case scenario for Tring with the proposed increase to the town. Please read and include the report findings in your final decision.</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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" (GBR/2)</p>

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.²¹ 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 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	LPIO19084
Full Name	Bill Ahearn
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 wish to register my objections to some of the proposals under consideration on the grounds they are simply too excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19132
Full Name	Bill Ahearn
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 wish to register my objections to some of the proposals under consideration on the grounds they are simply too excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 46, full document attached to question 46</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>

	<p>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" (East Hemel Hempstead) 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	LPIO19133
Full Name	Bill Ahearn
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>wish to register my objections to some of the proposals under consideration on the grounds they are simply to excessive and feel a more moderate scheme as set out in the attached report would be suitable</p> <p>GFRA Response to Question 46, full document attached to question 46</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:

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"...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.
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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*)

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"...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")*".

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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.

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, TR-H5 and TR-H6 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	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19135
Full Name	Janet Goldsborough
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 live in Bovingdon and am responding to the Local Plan Consultation.</p> <p>I object to more houses being built in Bovingdon because:</p> <p>The village is large enough. Significant development in Bovingdon will negatively impact on the quality of life.</p> <p>All services are full- infant school, GP surgeries.</p> <p>Local roads cannot cope with an increase in traffic.</p> <p>There is little work in Bovingdon therefore most people who live here have to travel by car to work. Box Lane is already one of the busiest B roads in Hertfordshire. The High Street is overcongested with cars and there is no where to park.</p> <p>There cannot be any increase in housing without parallel infrastructure improvements.</p> <p>We should not be building on Green Belt land.</p> <p>There are already plans to build new homes in Bovingdon in Molyneaux Avenue and Hyde Meadows.</p>
Include files	
Number	Question 46
ID	LPIO19142
Full Name	Ms Sarah Hain
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 completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19191
Full Name	Ms Sarah Hain
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 completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p>GFRA Response to Question 46, full document attached to question 46</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.

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.²¹ 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

	<p>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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19192
Full Name	Ms Sarah Hain
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 completely support the points discussed by the attached Report responding to the DBC planning consultation document. It addresses my own emotional and practical concerns about the town in which I live, as well as the wider area concerned, with a professionalism giving expert weight to its conclusions.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>

	<p>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" (East Hemel Hempstead) 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	LPIO19200
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19247
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19249
Full Name	Grove Fields Residents Association
Company / Organisation	Grove Fields Residents Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I attach a copy of the formal submission report raised in consultation to the Issues and Options paper on behalf of the Grove Fields Residents Association (GFRA). The GFRA represents 325 people, and I confirm that as of the 11th December 2017, this submission represents the position of all 325 members.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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>

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..."

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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.²¹ 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 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	LPIO19257
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town's infrastructure. We feel strongly that green belt land should be preserved for future generations.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19305
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town’s infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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" (GBR/2) refers to the NPPF. The NPPF obtains its legal force</p>

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.²¹ 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

	<p>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> <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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19306
Full Name	Marcus, Jane, Abigail and Jennifer Fox
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

<p>Your response - Please add your response here</p>	<p>Our family (4 adults) live in Tring and are extremely concerned about the proposed increase in housing for Tring. We are all members of Grove Fields Residents Association and attended the meetings at Pendley and Tring Town Council so that we could make an informed decision regarding the proposal from Dacorum Borough Council. GFRA response attached.</p> <p>We urge you to consider the issues and proposals in the attached report. Please do not develop Tring and further compromise the town’s infrastructure. We feel strongly that green belt land should be preserved for future generations</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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>
<p>Include files</p>	<p>GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf</p>
<p>Number</p>	<p>Question 46</p>
<p>ID</p>	<p>LPIO19358</p>
<p>Full Name</p>	<p>Stuart, Miranda & Melissa Kay</p>

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 & 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. 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>BRAG response to Question 46 (full document is attached)</p> <p>Question 46 <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 and 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 & 2) that has proved to</p>

be a deeply flawed process
(~~http://www.berkhamsted.gov.uk/development/DBC/DBC%20Guidance%20Review%20-%20Stage%201~~)
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 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 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
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- 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
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- 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
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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 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
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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"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO19408
Full Name	Wai Tang and Greg Barfoot
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 note we are aware that 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, we request you accept this as confirmation that we wish DBC to add BRAG's responses under our name.</p> <p>We wish to add our concerns to the DBC local plan issues and options consultation.</p>

We are particularly concerned about the following

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 (full document is attached)

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/2467/BRAG-Response-to-CA-17-01-17>)~~
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
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- 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 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

	<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"> 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	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO19454
Full Name	Philippa Jones
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 enclose a response to the impact of Dacorum Local Plan on Berkhamsted. This document was drawn up by a number of people including myself, and based on the Berkhamsted Citizens meeting on the Local Plan.</p> <p>Question 46</p> <p><i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>Yes</p> <p>General Comment:</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 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

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1 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.

1 BIODIVERSITY

Policy 96 of the Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local distinctiveness of the ecology of the area. Policy 102 deals specifically with sites of importance to nature conservation. PPS 9 also deals with biodiversity A Technical Study on Nature Conservation has been carried out in preparation for the Local Development Framework by Herts. Biological Research Centre [2006]. In addition to identifying major Biodiversity Sites, the work has identified important Biodiversity Corridors. While we appreciate that such sites and corridors are not protected by statute we feel their protection should form an important part of any assessment of housing site suitability as should the protection of 'Wildspace' more generally given its rapidly disappearing availability in Berkhamsted. The constant removal of local habitat and resources is degrading and removing the ability for biodiversity to function ecologically within the urban environment and this is of grave concern.

The Citizens had a visioning evening which informed our response to the consultation – please look at the web site, where you will see a short film of the event which gives a very good feel of the opinions of the 130 citizens that were there. There are also some tables which give all the notes taken during the discussions
 Citizens were also concerned that no mention is made of the developments that already have planning permission, or the developments on our borders that will create many more car movements using Berkhamsted roads, there are 1150 on the Potton End side of Old Hemel and 350 behind Piccots End which will create 9000 car movements a day which will probably use Berkhamsted Railway station and shopping area.

Here is the link to the web site which forms part of our response to the Issues and Options Consultation and the short film needs to be watched and the documents read along with this document as part of our response.
<http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/>

Include files	
Number	Question 46
ID	LPIO19462
Full Name	John Wignall
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 endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>It is only fair that Tring should take it's share of the additional houses required across Dacorum, but this should not be at the expense of the character of the town, the surrounding green belt, or the available infrastructure which is already severely stretched.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19509
Full Name	John Wignall
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 endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>GFRA Response to Question 46, full document attached to question 46</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,</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 "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:</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	LPIO19511
Full Name	John Wignall
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 endorse the findings of the attached report prepared for the Grove Fields Residents Association.</p> <p>It is only fair that Tring should take it's share of the additional houses required across Dacorum, but this should not be at the expense of the character of the town, the surrounding green belt, or the available infrastructure which is already severely stretched</p> <p>GFRA Response to Question 46, full document attached to question 46</p> <p>We have analysed the DBC's "Evidence Base" documentation and provide our "feedback" regarding</p>

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.²¹ 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.

	<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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19519
Full Name	Kevin Cullen
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 refer to the attached report.(BRAG)</p> <p>I would add that the number of planned new homes for Tring would destroy the fabric of the town and lay waste to the green belt that surrounds it. The numbers are horribly disproportionate and the already inadequate infrastructure could never cope. The plans are ill conceived, just filling in the green belt areas around the town with no vision of the impacts this would have . The station already can't cope, the car park is full by 9:30am each morning. New schools would be needed and how would jobs be created, or would everyone be expected to commute into London. The land between Marshcroft Lane and Station Road is too far from the town centre and too important as green belt.</p> <p>The town itself could not cope, there is insufficient parking, the only petrol station is about to close and both banks are leaving</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19566
Full Name	Kevin Cullen
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 refer to the attached report.(BRAG)</p> <p>Hemel presents a far more logical solution with the land to the East alongside the M1 ideal for expanding an already sizeable town</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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</i></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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19568
Full Name	Kevin Cullen
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 refer to the attached report.(BRAG)</p> <p>I would add that the number of planned new homes for Tring would destroy the fabric of the town and lay waste to the green belt that surrounds it. The numbers are horribly disproportionate and the already inadequate infrastructure could never cope. The plans are ill conceived, just filling in the green belt areas around the town with no vision of the impacts this would have . The station already can't cope, the car park is full by 9:30am each morning. New schools would be needed and how would jobs be created, or would everyone be expected to commute into London. The land between Marshcroft Lane and Station Road is too far from the town centre and too important as green belt.</p> <p>The town itself could not cope, there is insufficient parking, the only petrol station is about to close and both banks are leaving.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>

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.²¹ 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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LP1019576
Full Name	Mark Lawson and Sharon Wilkie
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 do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that.</p> <p>Yes it is very easy to build 500 -1000 houses on the land you have identified but without a proper infrastructure to support these families IE local working opportunities, transport links, schools and amenities you're just supporting an already stretched transport link to get everyone to London where the vast majority of residents in Tring work.....with an increase in pollution, traffic congestion.....and let's be honest the owners of the land have no interest in spending hard earned profits from housing on any infrastructure other than the odd road.....I work in Colindale, London where Redrow are undertaking a huge building project of flats but very little thought has gone into what goes to build and support a community</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19584
Full Name	Mark Lawson and Sharon Wilkie
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 do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that</p> <p>Yes it is very easy to build 500 -1000 houses on the land you have identified but without a proper infrastructure to support these families IE local working opportunities, transport links, schools and amenities you're just supporting an already stretched transport link to get everyone to London where the vast majority of residents in Tring work.....with an increase in pollution, traffic congestion.....and let's be honest the owners of the land have no interest in spending hard earned profits from housing on any infrastructure other than the odd road.....I work in Colindale, London where Redrow are undertaking a huge building project of flats but very little thought has gone into what goes to build and support a community.</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected</p> <p>GFRA Response to Question 46, full document attached to question 46</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,</p>

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.²¹ 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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19624
Full Name	Mark Lawson and Sharon Wilkie
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 do agree with the principle that more housing is probably required however there has to be a common sense approach to the problem and considerable thought has got to be given to a proper infrastructure and the funding to support that</p> <p>I do hope you take the time to read this report and look at the positives and alternatives in the document which I think is a lot more balanced than I expected</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East</p>

	<p>Hemel Hempstead) 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	LPIO19633
Full Name	Vivienne Inmonger
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 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>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. This particularly applies to sites TR-H1, TR-H2 and TR-H3 where the import of development would Vade significant harm to the environment, the local community and the AONB. Development of these sites should there not be part of the Final Local Plan.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LP1019680
Full Name	Vivienne Inmonger
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 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>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>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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</i></p>

	<p>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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19682
Full Name	Vivienne Inmonger
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 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>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. This particularly applies to sites TR-H1, TR-H2 and TR-H3 where the import of development would cause significant harm to the environment, the local community and the AONB. Development of these sites should not be part of the Final Local Plan.</p> <p>GFRA Response to Question 46, full document attached to question 46</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.²¹ 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, TR-H5 and TR-H6 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	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19683
Full Name	R.W Poole
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I would like to object to the intended planning in the kings Langley area, therefore can you email the forms needed
Include files	
Number	Question 46
ID	LPIO19684
Full Name	Dr Ravi Pawa
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Having read the information available, the documents and website I believe my answer is a firm 'no'</p> <p>The reasons are</p> <p>Firstly regarding roads and traffic infrastructure; your document does not show exactly how this will be addressed. There will be an increase of private cars somewhere between 15 and 25,000 in my estimate. Even at the bottom end this is a huge additional increase of traffic and current pressure points just will not cope. They do not cope currently</p> <p>Currently there are congestion areas in Kings Langley village every day especially at peak times and on the weekends. There isn't enough parking now. Your</p>

	<p>document has not addressed how the increasing necessary parking will be addressed</p> <p>There will be an increased demand on public transport both buses and trains. Trains into and out of London are already not adequate as it is. You need to outline how you will address this will there be more trains or will you increase them to double-decker trains liking Europe? In rush hours there isn't enough room on the train even for standing, so this has already exceeded demand</p> <p>Health care</p> <p>We already struggle sometimes to get a timely appointment with the general practitioner all in the hospital. Please outline how this will be addressed</p> <p>Please also detail how the hospitals will cope including parking in transport to the hospital.</p> <p>Finally I would like to know how traffic, roadworks, and other disruption caused by the building, and putting in electricity and other utilities, how this will be solved without causing total chaos to people travelling especially at commuting times</p>
Include files	
Number	Question 46
ID	LP1019693
Full Name	John Inmonger
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 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>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 strongly feel 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 the import of development would cause significant harm to the environment, the local community and the AONB. Development of these sites should there not be part of the Final Local Plan</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19739
Full Name	John Inmonger
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 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>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>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19741
Full Name	John Inmonger
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 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>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 strongly feel 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 the import of development would cause significant harm to the environment, the local community and the AONB. Development of these sites should there not be part of the Final Local Plan</p> <p>GFRA Response to Question 46, full document attached to question 46</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>

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.²¹ 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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19742
Full Name	Mr Robin Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Please note</u> that Ridgeway Close and Shendish are in the village of Kings Langley not Hemel Hempstead, as is suggested in your options paper.</p> <p>I would like to feed back on the house building programme consultation paper that was published last month. I, along with more than 800 other Kings Langley residents attended an Extraordinary Parish meeting on the 14th of November where there was overwhelming support for Kings Langley parish to hold a village poll on these proposals, which is being arranged right now. There was passionate opposition to green belt development expressed at that meeting.</p> <p>I do not believe that it is sustainable to build a significant number of houses in and around Kings Langley village. Option 1A appears to have the lowest impact on the village but I want to emphasise that if Option 1A is selected, this should <u>exclude</u> site reference HH-h3 the Shendish Manor development, which appears to be incorrectly listed under Hemel Hempstead, when it is clearly in Kings Langley.</p> <p>To provide some rationale for my objection, I would put forward the following points:</p> <p><u>Roads & Safety</u></p> <p>I attach some photos taken outside my house, Ridgeway Close, just off the A4251 London Road right at the bottom of the single narrow access lane that goes up to Shendish Manor. Every single day around rush hour in the morning and evening, there is total gridlock outside</p>

our house. Hundreds of cars sit stationary for around an hour while everyone struggles to get to work and do the school run. Since all the new builds have gone up around Apsley Lock and down to Red Lion lane, the parking and travel situation around our area has become ridiculous, and the air quality when walking out the door in the morning is very poor due to all these stationary cars sitting with their engines running, going nowhere. Building any more houses along this road without a significant and impractical upgrade/bypass cannot be considered. The traffic is already at crisis levels and something urgent needs to be done simply to cope with existing demand. Building more houses, unless they were built without parking and on condition that owners are now allowed to own cars, as some cities in the UK do, would be throwing petrol on the fire, do not even consider it. Crossing the A4251 tends to be a dangerous experience due to a lack of pedestrian crossing points, very narrow pavements, and on the occasions when traffic is moving (ie. not around rush hour) visibility is poor on many bends, and I see kids having to make a dash to get across, dodging frustrated drivers.

If new development were to be entertained at Shendish Manor, a new slip road directly off the A41 bypass would have to be constructed before any housing was built. The narrow unlit lane up to Shendish, which goes over a single track stone bridge, will not in any way be suitable to service 900+ homes plus the proposed Primary school. It would have to be linked directly to the A41 only, to keep any traffic from that development off the A4251.

Hospitals & Doctors Surgeries

My wife is currently pregnant and the maternity units at both Hemel Hempstead Hospital and St Albans hospitals have been closed in the past few years, meaning that Watford is the only feasible option for us. It is a significant source of stress to us right now, that if she was to go into labour during a busy time of day, it could easily take us 90 minutes to get to Watford Hospital in the current traffic congestion we have been experiencing since the new builds went up, and nothing was done about transport. It can easily take us 10+ minutes just to turn out of our street onto the A4251 with frustrated drivers sitting nose-to-tail in gridlock refusing to make way for us to join.

If a significant number of new houses are to be built in this area, much improved hospital provision will be required. Hemel hospital A&E would need to be re-instated and the trend to run things down in that hospital completely reversed, or a brand new hospital would need to be built. You can't green light all these additional houses without careful consideration and provision of adequate healthcare for routine and emergency treatment.

In terms of doctors surgeries, at least one additional surgery would be required to cope with thousands of additional families living in the semi-rural Kings Langley locale. I do not believe that the existing two surgeries could cope without significant expansion, which in the case of Haverfield would not be possible.

Schools

The proposal for the build up at Shendish includes a Primary School I understand. There would obviously also be a requirement for a significant number of additional secondary school places if so many families are to be brought into the area. Why would the proposal add a Primary School but not a Secondary School, given that there is already a Primary school closer to this development than any secondary school? I understand that Kings Langley secondary school, the only regular (non-private) secondary school in the village is close to capacity, and has just been re-developed, where some of the land that it could potentially expand onto was sold to developers. Rudolph Steiner school appears to be in danger of being closed after a number of negative stories in the press. It is not sustainable to build this many new houses without provision of additional Secondary school places.

Trains to London

I commute daily into London from Apsley Station on the London Midland service into Euston. At rush hour the trains are totally packed beyond full, with standing room only, if that. It is often like traveling in the London Tube in rush hour, crammed against a wall or door for the entire trip into London, with more and more people getting on at each stop, on ancient draughty rolling stock. The train service today is barely fit for purpose. More people cannot be brought to live in this area without additional trains, longer trains, or a more frequent service. The planning department cannot put blinkers on and say this is the responsibility of another department - it will be a very real problem that will bring misery to hundreds/thousands of commuters day in and day out. Something must be done to add additional train services if any more houses are to be built in this area. Apsley station is also close to capacity at rush hour with 20-25 minute queues to buy tickets from the single ticket machine and booking office if it is open. The platforms sometimes get dangerously full with commuters if a train is delayed or cancelled, and 2x the people try to get on the next service. These facts cannot be ignored and the solutions are going to be expensive and time consuming to implement. You have got to assume that a fair proportion of people moving to this area are going to be commuting into London, given the vicinity. It will be a major issue.

Parking

There are already issues with parking in Kings Langley village and up around Ridgeway Close and Shendish edge. Proposals to put down double yellow lines or single yellows in some areas have been discussed in the past. As more and more houses get built, it is becoming a bigger and bigger problem. Specifically in Red Lion lane, since the new flats were built along there, that road now has parked cars solid along both sides, making HGV and Bus access more difficult. Similarly, cars park on both sides of the road in the KL village centre, making it hard to busses, HGVs and larger vehicles to pass each other, exacerbating the traffic problems around rush hour, and making the air more polluted. Building

hundreds of new high-density flats (as I assume these will end up being, probably not detached bungalows) with one or two allocated spots each at best, will not neutralise the impact of these new properties on the parking issues in the local area. Unless these properties can be built with conditions that the owner may not have a car, which I'm sure won't happen, then the parking and traffic situation locally will become unbearable, as it is close to being already.

Inadequate access to Shendish

As I mentioned above the lane up to Shendish today is a very narrow, unlit lane which takes a very modest amount of traffic up to the manor house and the handful of historical houses up there. It is totally unsuitable to carry a significant volume of traffic. The junction onto A4251 is already on a very congested bit of road, and comes out within a few feet of the end of my road, Ridgeway Close, so I frequently have to walk across the Shendish lane when I walk anywhere from my house (as there is no pavement in the other direction). Increasing the traffic volume on this road will be unsafe, as the junction itself cannot be widened as there is a house directly on each side, and it is a blind 90 degree bend almost immediately off A4251, so you don't see cars coming - but you can rely on the fact that they come up and down very rarely today. If volumes increased, this lane would be unsafe for pedestrians.

The only option I can see would be to build the new houses without access to this lane, and build a slip road directly off the A41 for them. If they were connected at both ends, you'd end up with a rat run to get on/off the A41, which would make matters even worse. I'd imagine the lead time to get a slip road built across the private land onto the A41 would add a lot of pre-work and cost to the development project.

Jobs

There are very few jobs in and around the village. If the proposal is to build a significant portion of affordable housing for people to live in, it makes sense that they should live close to where they work. There are a very small number of boutique shops in the village, which would be a considerable walk down from Shendish. It makes sense to build more houses on brown field sites close to Hemel Hempstead and St Albans, where the jobs are. There are very few in the Village, and adding houses where there are no jobs will add to the transport problems. People should be able to walk or cycle to work.

Wayside Farm Impact

I understand that some of the options under consideration would include development on Wayside Farm at the south end of the village. I would point out that Wayside farm is one of only two working dairy farms in this constituency, and has been a great local success story. Charlie, the tenant in Wayside is well known in the village and sells delicious raw milk to the local residents, promoting health and a connection with the rural heritage of the area. This farm cannot be allowed to disappear, it must remain in council hands, and under

the existing tenancy for as long as Charlie is willing to work the farm.

Kings Langley is a special Village

Kings Langley is a special place. It is a village, by definition a small settlement. It is surrounded by green belt, which was designated for a reason, that must be respected. It is not part of Watford and not part of Hemel Hempstead, it is a separate place with it's own unique character and identity. I have great fears that development after development, Hemel is encroaching from the north and Watford is encroaching from the south - if the green belt designation is not respected, that it will be swallowed up. The proposed developments at Wayside and Hill farms would allow initially a limited number of houses to be built, but there is a huge danger of a coalescence of settlements, these builds to the south of the village plus the proposed Shendish development would effectively mean that Hemel would extend all the way to the M25 - if these builds are permitted, there is a real danger that further development would not be controlled and Hemel would sprawl all the way down to the M25/A41 junction, and within striking distance of Watford, which would most likely be undergoing similar development to expand it northwards. This cannot be a future that any of us want or can allow to happen. The village will be gone. it's ethos lost forever.

On the farm developments (Q46) I would state that Hill Farm is not suitable for development as it has a lack of access and is too far from the village. Wayside (as stated above) could not be controlled and will be sprawling to the A41 eventually, once the precedent is set.

In specific response to Question 22 - the proposal to provide additional office space on the farm site. I would point out that the office space that has been made available to the north of the borough, for the same rationale, has not been taken up and remains vacant.

I believe that building more houses in the Kings Langley village area (including Shendish) will have a direct adverse impact on the health, leisure, education and happiness of me and my family and I am totally opposed to it. The infrastructure around the village is already creaking under the weight of all the recent developments - the proposals in this document would magnify these issues ten fold. Unless a joined up proposal can be put forward which addresses the issues of schools, hospitals, doctors surgeries, roads, public transport and the environment, showing that all will be funded and addresses coherently and in parallel, this development cannot be permitted, obviously. Whatever the government strategy, it cannot ignore reality, and departments can't pass the buck and operate with blinkers on, ignorant of the real world impact of their decisions.

I bought my house in Ridgeway Close as a semi-rural location on the edge of the Kings Langley village. All the new builds around here are advertising an idillic semi-rural life with rolling fields, trees, wildlife and walks in the countryside. This vision for Hertfordshire can only hold if the green belt is respected, the character of areas and separation between settlements is respected.

	Progress is required, but it cannot be done without regard for the heritage, character and spirit of the special locations that exist around Dacroum. Kings Langley was once the capital of England for a short period. Please don't allow it to disappear.
Include files	Robin Brown Traffic Pictures.pdf
Number	Question 46
ID	LPIO19743
Full Name	Mr Robin Brown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Please note</u> that Ridgeway Close and Shendish are in the village of Kings Langley not Hemel Hempstead, as is suggested in your options paper.</p> <p>I would like to feed back on the house building programme consultation paper that was published last month. I, along with more than 800 other Kings Langley residents attended an Extraordinary Parish meeting on the 14th of November where there was overwhelming support for Kings Langley parish to hold a village poll on these proposals, which is being arranged right now. There was passionate opposition to green belt development expressed at that meeting.</p> <p>I do not believe that it is sustainable to build a significant number of houses in and around Kings Langley village. Option 1A appears to have the lowest impact on the village but I want to emphasise that if Option 1A is selected, this should <u>exclude</u> site reference HH-h3 the Shendish Manor development, which appears to be incorrectly listed under Hemel Hempstead, when it is clearly in Kings Langley.</p> <p>To provide some rationale for my objection, I would put forward the following points:</p> <p><u>Roads & Safety</u></p> <p>I attach some photos taken outside my house, Ridgeway Close, just off the A4251 London Road right at the bottom of the single narrow access lane that goes up to Shendish Manor. Every single day around rush hour in the morning and evening, there is total gridlock outside our house. Hundreds of cars sit stationary for around an hour while everyone struggles to get to work and do the school run. Since all the new builds have gone up around Apsley Lock and down to Red Lion lane, the parking and travel situation around our area has become ridiculous, and the air quality when walking out the door in the morning is very poor due to all these stationary cars sitting with their engines running, going nowhere. Building any more houses along this road without a significant and impractical upgrade/bypass cannot be considered. The traffic is already at crisis levels and</p>

something urgent needs to be done simply to cope with existing demand. Building more houses, unless they were built without parking and on condition that owners are now allowed to own cars, as some cities in the UK do, would be throwing petrol on the fire, do not even consider it. Crossing the A4251 tends to be a dangerous experience due to a lack of pedestrian crossing points, very narrow pavements, and on the occasions when traffic is moving (ie. not around rush hour) visibility is poor on many bends, and I see kids having to make a dash to get across, dodging frustrated drivers.

If new development were to be entertained at Shendish Manor, a new slip road directly off the A41 bypass would have to be constructed before any housing was built. The narrow unlit lane up to Shendish, which goes over a single track stone bridge, will not in any way be suitable to service 900+ homes plus the proposed Primary school. It would have to be linked directly to the A41 only, to keep any traffic from that development off the A4251.

Hospitals & Doctors Surgeries

My wife is currently pregnant and the maternity units at both Hemel Hempstead Hospital and St Albans hospitals have been closed in the past few years, meaning that Watford is the only feasible option for us. It is a significant source of stress to us right now, that if she was to go into labour during a busy time of day, it could easily take us 90 minutes to get to Watford Hospital in the current traffic congestion we have been experiencing since the new builds went up, and nothing was done about transport. It can easily take us 10+ minutes just to turn out of our street onto the A4251 with frustrated drivers sitting nose-to-tail in gridlock refusing to make way for us to join.

If a significant number of new houses are to be built in this area, much improved hospital provision will be required. Hemel hospital A&E would need to be re-instated and the trend to run things down in that hospital completely reversed, or a brand new hospital would need to be built. You can't green light all these additional houses without careful consideration and provision of adequate healthcare for routine and emergency treatment.

In terms of doctors surgeries, at least one additional surgery would be required to cope with thousands of additional families living in the semi-rural Kings Langley locale. I do not believe that the existing two surgeries could cope without significant expansion, which in the case of Haverfield would not be possible.

Schools

The proposal for the build up at Shendish includes a Primary School I understand. There would obviously also be a requirement for a significant number of additional secondary school places if so many families are to be brought into the area. Why would the proposal add a Primary School but not a Secondary School, given that there is already a Primary school closer to this development than any secondary school? I understand that Kings Langley secondary school, the only regular (non-private) secondary school in the village is close to

capacity, and has just been re-developed, where some of the land that it could potentially expand onto was sold to developers. Rudolph Steiner school appears to be in danger of being closed after a number of negative stories in the press. It is not sustainable to build this many new houses without provision of additional Secondary school places.

Trains to London

I commute daily into London from Apsley Station on the London Midland service into Euston. At rush hour the trains are totally packed beyond full, with standing room only, if that. It is often like traveling in the London Tube in rush hour, crammed against a wall or door for the entire trip into London, with more and more people getting on at each stop, on ancient draughty rolling stock. The train service today is barely fit for purpose. More people cannot be brought to live in this area without additional trains, longer trains, or a more frequent service. The planning department cannot put blinkers on and say this is the responsibility of another department - it will be a very real problem that will bring misery to hundreds/thousands of commuters day in and day out. Something must be done to add additional train services if any more houses are to be built in this area. Apsley station is also close to capacity at rush hour with 20-25 minute queues to buy tickets from the single ticket machine and booking office if it is open. The platforms sometimes get dangerously full with commuters if a train is delayed or cancelled, and 2x the people try to get on the next service. These facts cannot be ignored and the solutions are going to be expensive and time consuming to implement. You have got to assume that a fair proportion of people moving to this area are going to be commuting into London, given the vicinity. It will be a major issue.

Parking

There are already issues with parking in Kings Langley village and up around Ridgeway Close and Shendish edge. Proposals to put down double yellow lines or single yellows in some areas have been discussed in the past. As more and more houses get built, it is becoming a bigger and bigger problem. Specifically in Red Lion lane, since the new flats were built along there, that road now has parked cars solid along both sides, making HGV and Bus access more difficult. Similarly, cars park on both sides of the road in the KL village centre, making it hard to busses, HGVs and larger vehicles to pass each other, exacerbating the traffic problems around rush hour, and making the air more polluted. Building hundreds of new high-density flats (as I assume these will end up being, probably not detached bungalows) with one or two allocated spots each at best, will not neutralise the impact of these new properties on the parking issues in the local area. Unless these properties can be built with conditions that the owner may not have a car, which I'm sure won't happen, then the parking and traffic situation locally will become unbearable, as it is close to being already.

Inadequate access to Shendish

As I mentioned above the lane up to Shendish today is a very narrow, unlit lane which takes a very modest amount of traffic up to the manor house and the handful of historical houses up there. It is totally unsuitable to carry a significant volume of traffic. The junction onto A4251 is already on a very congested bit of road, and comes out within a few feet of the end of my road, Ridgeway Close, so I frequently have to walk across the Shendish lane when I walk anywhere from my house (as there is no pavement in the other direction). Increasing the traffic volume on this road will be unsafe, as the junction itself cannot be widened as there is a house directly on each side, and it is a blind 90 degree bend almost immediately off A4251, so you don't see cars coming - but you can rely on the fact that they come up and down very rarely today. If volumes increased, this lane would be unsafe for pedestrians.

The only option I can see would be to build the new houses without access to this lane, and build a slip road directly off the A41 for them. If they were connected at both ends, you'd end up with a rat run to get on/off the A41, which would make matters even worse. I'm imagining the lead time to get a slip road built across the private land onto the A41 would add a lot of pre-work and cost to the development project.

Jobs

There are very few jobs in and around the village. If the proposal is to build a significant portion of affordable housing for people to live in, it makes sense that they should live close to where they work. There are a very small number of boutique shops in the village, which would be a considerable walk down from Shendish. It makes sense to build more houses on brown field sites close to Hemel Hempstead and St Albans, where the jobs are. There are very few in the Village, and adding houses where there are no jobs will add to the transport problems. People should be able to walk or cycle to work.

Kings Langley is a special Village

Kings Langley is a special place. It is a village, by definition a small settlement. It is surrounded by green belt, which was designated for a reason, that must be respected. It is not part of Watford and not part of Hemel Hempstead, it is a separate place with its own unique character and identity. I have great fears that development after development, Hemel is encroaching from the north and Watford is encroaching from the south - if the green belt designation is not respected, that it will be swallowed up. The proposed developments at Wayside and Hill farms would allow initially a limited number of houses to be built, but there is a huge danger of a coalescence of settlements, these builds to the south of the village plus the proposed Shendish development would effectively mean that Hemel would extend all the way to the M25 - if these builds are permitted, there is a real danger that further development would not be controlled and Hemel would sprawl all the way down to the M25/A41 junction, and within striking distance of Watford, which would most likely be undergoing similar development to expand it northwards. This cannot be a

	<p>future that any of us want or can allow to happen. The village will be gone. it's ethos lost forever.</p> <p>I believe that building more houses in the Kings Langley village area (including Shendish) will have a direct adverse impact on the health, leisure, education and happiness of me and my family and I am totally opposed to it. The infrastructure around the village is already creaking under the weight of all the recent developments - the proposals in this document would magnify these issues ten fold. Unless a joined up proposal can be put forward which addresses the issues of schools, hospitals, doctors surgeries, roads, public transport and the environment, showing that all will be funded and addresses coherently and in parallel, this development cannot be permitted, obviously. Whatever the government strategy, it cannot ignore reality, and departments can't pass the buck and operate with blinkers on, ignorant of the real world impact of their decisions.</p> <p>I bought my house in Ridgeway Close as a semi-rural location on the edge of the Kings Langley village. All the new builds around here are advertising an idyllic semi-rural life with rolling fields, trees, wildlife and walks in the countryside. This vision for Hertfordshire can only hold if the green belt is respected, the character of areas and separation between settlements is respected. Progress is required, but it cannot be done without regard for the heritage, character and spirit of the special locations that exist around Dacorum. Kings Langley was once the capital of England for a short period. Please don't allow it to disappear.</p>
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Number	Question 46
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Full Name	Mr Robin Brown
Company / Organisation	
Position	
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Your Opinion - Please state your opinion here	Yes
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selected, this should exclude site reference HH-h3 the Shendish Manor development

To provide some rationale for my objection, I would put forward the following points:

Roads & Safety

I attach some photos taken outside my house, Ridgeway Close, just off the A4251 London Road right at the bottom of the single narrow access lane that goes up to Shendish Manor. Every single day around rush hour in the morning and evening, there is total gridlock outside our house. Hundreds of cars sit stationary for around an hour while everyone struggles to get to work and do the school run. Since all the new builds have gone up around Apsley Lock and down to Red Lion lane, the parking and travel situation around our area has become ridiculous, and the air quality when walking out the door in the morning is very poor due to all these stationary cars sitting with their engines running, going nowhere. Building any more houses along this road without a significant and impractical upgrade/bypass cannot be considered. The traffic is already at crisis levels and something urgent needs to be done simply to cope with existing demand. Building more houses, unless they were built without parking and on condition that owners are now allowed to own cars, as some cities in the UK do, would be throwing petrol on the fire, do not even consider it. Crossing the A4251 tends to be a dangerous experience due to a lack of pedestrian crossing points, very narrow pavements, and on the occasions when traffic is moving (ie. not around rush hour) visibility is poor on many bends, and I see kids having to make a dash to get across, dodging frustrated drivers

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On the farm developments (Q46) I would state that Hill Farm is not suitable for development as it has a lack of access and is too far from the village. Wayside (as stated above) could not be controlled and will be sprawling to the A41 eventually, once the precedent is set.

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Company / Organisation	
Position	
Agent Name	
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Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Please note</u> that Ridgeway Close and Shendish are in the village of Kings Langley not Hemel Hempstead, as is suggested in your options paper.</p> <p>I would like to feed back on the house building programme consultation paper that was published last month. I, along with more than 800 other Kings Langley residents attended an Extraordinary Parish meeting on the 14th of November where there was overwhelming support for Kings Langley parish to hold a village poll on these proposals, which is being arranged right now. There was passionate opposition to green belt development expressed at that meeting.</p> <p>I do not believe that it is sustainable to build a significant number of houses in and around Kings Langley village. To provide some rationale for my objection, I would put forward the following points:</p> <p><u>Roads & Safety</u></p> <p>I attach some photos taken outside my house, Ridgeway Close, just off the A4251 London Road right at the bottom of the single narrow access lane that goes up to Shendish Manor. Every single day around rush hour in the morning and evening, there is total gridlock outside our house. Hundreds of cars sit stationary for around an</p>

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Wayside Farm Impact

I understand that some of the options under consideration would include development on Wayside Farm at the south end of the village. I would point out that Wayside farm is one of only two working dairy farms in this constituency, and has been a great local success story. Charlie, the tenant in Wayside is well known in the village and sells delicious raw milk to the local residents, promoting health and a connection with the rural heritage of the area. This farm cannot be allowed to disappear, it must remain in council hands, and under the existing tenancy for as long as Charlie is willing to work the farm.

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In specific response to Question 22 - the proposal to provide additional office space on the farm site. I would point out that the office space that has been made available to the north of the borough, for the same rationale, has not been taken up and remains vacant.

	<p>I believe that building more houses in the Kings Langley village area (including Shendish) will have a direct adverse impact on the health, leisure, education and happiness of me and my family and I am totally opposed to it. The infrastructure around the village is already creaking under the weight of all the recent developments - the proposals in this document would magnify these issues ten fold. Unless a joined up proposal can be put forward which addresses the issues of schools, hospitals, doctors surgeries, roads, public transport and the environment, showing that all will be funded and addresses coherently and in parallel, this development cannot be permitted, obviously. Whatever the government strategy, it cannot ignore reality, and departments can't pass the buck and operate with blinkers on, ignorant of the real world impact of their decisions.</p> <p>I bought my house in Ridgeway Close as a semi-rural location on the edge of the Kings Langley village. All the new builds around here are advertising an idyllic semi-rural life with rolling fields, trees, wildlife and walks in the countryside. This vision for Hertfordshire can only hold if the green belt is respected, the character of areas and separation between settlements is respected. Progress is required, but it cannot be done without regard for the heritage, character and spirit of the special locations that exist around Dacorum. Kings Langley was once the capital of England for a short period. Please don't allow it to disappear.</p>
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Number	Question 46
ID	LPIO19793
Full Name	Ben Barth
Company / Organisation	
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Agent Name	
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Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Here are my comments on the proposed local plan are set out on the attached document which I fully endorse (full document on q 46)</p> <p>Question 46</p> <p><i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>Yes</p> <p>General Comment:</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</p>

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 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

-

1 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.

1 **BIODIVERSITY**

Policy 96 of the Dacorum Borough Local Plan seeks to protect nature conservation interests in order to maintain and improve local distinctiveness of the ecology of the area. Policy 102 deals specifically with sites of importance to nature conservation. PPS 9 also deals with biodiversity A Technical Study on Nature Conservation has been carried out in preparation for the Local Development Framework by Herts. Biological Research Centre [2006]. In addition to identifying major Biodiversity Sites, the work has identified important Biodiversity Corridors. While we appreciate that such sites and corridors are not protected by statute we feel their protection should form an important part of any assessment of housing site suitability as should the protection of 'Wildspace' more generally given its rapidly disappearing availability in Berkhamsted. The constant removal of local habitat and resources is degrading and removing the ability for biodiversity to function ecologically within the urban environment and this is of grave concern.

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

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

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

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

Include files	Benny Barth - local plan response.pdf
Number	Question 46

ID	LPIO19800
Full Name	Miss Hannah Moynehan
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 also agree with Aldbury Parish council that there are particular issues with infrastructure at Tring Station - both in terms of the inadequate parking at the station and road access to the station - these must be considered and clear plans developed <u>before</u> any approval for considerable housing development at the sites Tr-h1, Tr-h2 and Tr-h3 is approved. "The Tring railway station car park is full to capacity before the end of peak travel time on weekdays " and "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."</p> <p>These issues will be exacerbated by plans for increased housing in neighbouring counties - in particular those in RAF Halton, Pitstone, Aston Clinton, Weston Turville and Wendover. It must be expected that some residents of any new developments in these areas will want to use Tring Station which is already unable to cope</p>
Include files	
Number	Question 46
ID	LPIO19804
Full Name	Stephen, Oonagh and James Green
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 on behalf of my wife, our son and myself to object in the strongest possible terms to the proposed housing development planned in Berkhamsted and in particular the infill developments to the South of the town up to the A41.</p> <p>The infrastructure of the town is already at or beyond capacity with a shortage of school places and, for example, difficulty in getting a doctor's appointment.</p> <p>A major concern is the already over-stretched road system and car parking (and in our view the additional parking proposed adjacent to Waitrose will just add to the extreme traffic congestion in Lower Kings Road).</p> <p>I normally leave for work at around 6.30am and, as you would expect, I can drive to the station in a few minutes.</p>

	<p>However even with the new traffic lights, on the stroke of 7.30 a long tailback develops at the junction of Shooters Way and Kings Road. This congestion continues to develop until it reaches a peak at about 8.15 - 8.30 at which time it can take 40 minutes to drive to the station.</p> <p>Development to the South of Shootersway will inevitably add to this congestion with additional traffic movements. Although it is entirely possible to walk in to town from Shootersway (and I have done so on many occasions) car usage is almost essential if one lives in this part of town. For example, either driving to Tesco in Tring or, for those who can afford it, driving to and from Waitrose - walking back up Kings Road with a weekly shop is not a realistic possibility</p> <p>Our comments may be seen as simple 'Nimbyism" but let me say that I grew up in Hemel Hempstead in the 50's and 60's when it was a really nice place to live; well-planned and maintained with a good mix of housing, interspersed with open play spaces. The additional developments that have taken place in Hemel have changed the character entirely and I believe made it a less balanced and less attractive place to live. I feel that with the current proposals there is a real danger of Berkhamsted going the same way if it is developed regardless of the ability of the town to support such growth</p>
Include files	
Number	Question 46
ID	LPIO19805
Full Name	Stephen, Oonagh and James Green
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We were surprised to see Berkhamsted School support the development of Haslam Playing fields. Whilst a quick cash injection from the sale of the site would undoubtedly fund some new project at the school, displacing activities from Haslam to Haresfoot for example will simply add to the traffic movements as children are driven to and from sports activities before and after school and at the weekend. This cannot be an environmentally sound concept
Include files	
Number	Question 46
ID	LPIO19815
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>I recognise the need to allocate land for development within Dacorum, but am naturally concerned that the nature and character of the compact market town of Tring, its surroundings and the natural environment should be protected.</p> <p>The town already faces significant issues in terms of the available transport and social infrastructure and, if further development is approved, it is essential that sufficient focus is placed on ensuring that additional capacity for schooling and healthcare services in particular are delivered and that transport links do not become further congested. In addition, it is likely that any increase in housing will cause additional pressure on parking facilities at Tring station, which already struggle to provide the required capacity. I do not believe any of the proposals include provision to mitigate this issue and it should be recognised that this will need to be addressed as part of any prospective development.</p> <p>In my opinion, development of the land referenced as Tr-h2 and Tr-h3 would significantly compromise the surrounding greenbelt and cause the most significant infrastructure issues within Tring (particularly with regard to access to transport links and pressure on local services).</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p> <p>Q48</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19862

Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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	LPIO19864
Full Name	Jon Esson
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 a member of the Grove Fields Residents Association and support the findings set out in their report as attached</p> <p>I recognise the need to allocate land for development within Dacorum, but am naturally concerned that the nature and character of the compact market town of Tring, its surroundings and the natural environment should be protected.</p> <p>The town already faces significant issues in terms of the available transport and social infrastructure and, if further development is approved, it is essential that sufficient focus is placed on ensuring that additional capacity for schooling and healthcare services in particular are delivered and that transport links do not become further congested. In addition, it is likely that any increase in housing will cause additional pressure on parking facilities at Tring station, which already struggle to provide the required capacity. I do not believe any of the proposals include provision to mitigate this issue and it should be recognised that this will need to be addressed as part of any prospective development.</p> <p>In my opinion, development of the land referenced as Tr-h2 and Tr-h3 would significantly compromise the surrounding greenbelt and cause the most significant infrastructure issues within Tring (particularly with regard to access to transport links and pressure on local services).</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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</i></p>

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.²¹ 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 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	LPIO19865
Full Name	R.J. Hollis
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 live in Berkhamsted, obviously this is my main interest.</p> <p>Over recent years much housing has been provided here; more than the current plan target but generally not of the type required to give a balanced population, just that which gives the developer the best profit. This development has not been accompanied by any additional infrastructure, so services are currently stretched.</p> <p>The present consultation considers various sites, which in my view are clearly inappropriate. For example the sites along Shooters Way. Current development here is already causing problems on the roads, further construction will exacerbate this. The lamentable lack of investment and strategy for public transport means that these remote additions will all result in more cars in the town centre.</p> <p>The plan should take account of the present town character. This is a valley market town with a strong commuter contingent and lots of green belt. Current train services are reasonable but often full. The type of development proposed will inevitably bring more commuters rather than local workers. Increased rail services are not considered and unlikely for just one station so overcrowding and car parking problems will increase. Government guidance states that green belt land should not be sacrificed for development, yet a number of the sites encroach.</p> <p>Another consideration on infrastructure is medical services. Currently my GP practice is considering amalgamating with others to save money, so fewer people will be able to walk to the doctors, again increasing traffic. Recently our local clinic has closed. So these services are getting worse whilst the demand will increase as more housing is built.</p> <p>I first moved to Hertfordshire to live in Hemel Hempstead, which had a grand plan covering most requirements for civilized living. In my opinion this holistic outlook is how all development should be planned, just adding housing numbers is a poor substitute and likely to fail.</p> <p>Of the options proposed the least objectionable to my mind is 1B, please consider this as my choice.</p>
Include files	
Number	Question 46

ID	LPIO19867
Full Name	Pat McCombe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Kings Langley is a village with clear boundaries which retain its character and atmosphere even with its close proximity to the M25 and A41. The loss of Wayside Farm would be catastrophic - it supports wildlife, houses one of only 2 herds of Jersey cows in the county which supply raw milk and also has a local farm shop. To also include commercial units on this site seems a contradiction in ideas as a nearby commercial unit is being converted into flats, advertised as 'Luxury apartments'.
Include files	
Number	Question 46
ID	LPIO19868
Full Name	Pat McCombe
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 wish to strongly object to the plans for DBC to release greenbelt land for building on.</p> <p>My preferred option is 1A, not including Shensdish (Site reference HH-h3).</p> <p>Kings Langley is a village with clear boundaries which retain its character and atmosphere even with its close proximity to the M25 and A41. The loss of Wayside Farm would be catastrophic - it supports wildlife, houses one of only 2 herds of Jersey cows in the county which supply raw milk and also has a local farm shop. To also include commercial units on this site seems a contradiction in ideas as a nearby commercial unit is being converted into flats, advertised as 'Luxury apartments'.</p> <p>A number of local areas (such as Bovingdon, Chipperfield, Hemel Hempstead and Apsley) already use the High Street and other local roads. This causes congestion not only at peak times but regularly along these roads and lanes.</p> <p>I have a real concern that although council has a target that 40 percent of houses built should be affordable housing, reports seem to indicate that developers are able to avoid this if they feel they will not make a reasonable profit.</p>

	<p>It is well documented how much strain Watford General Hospital is under and adding to this must be undesirable. Recent reports also indicate that services are to be further downgraded at Hemel Hempstead Hospital, (also an undesirable situation.) Local primary and secondary schools would also be put under strain. Kings Langley Senior School has only just been rebuilt, doing away with temporary classrooms which were in use when my own sons attended 20 years ago; it would be a retrograde step if these were reintroduced due to local overdevelopment.</p> <p>Kings Langley cannot support further development. Its historic character and identity are being threatened by these plans and other areas in the Borough can better support the necessary further development.</p> <p>I strongly advocate that you resist further development of local Greenbelt Land and concentrate instead, as the Government policy suggests, on the use of Brownfield sites and other previously developed land.</p>
Include files	
Number	Question 46
ID	LP1019872
Full Name	Chris Ansell
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 attended the meeting at Kings Langley Cricket Club outlining the proposals for house building in Kings Langley and the surrounding areas recently and would like to offer some opinions for your consideration.</p> <p>Of all the options, obviously Option 1A is the most appropriate as I understand the council has to meet government house building targets and this option would do so without greatly impacting the lovely views and green spaces offered by Kings Langley. I do, however, want to stress that whilst agreeing with Option 1A, I don't agree with any development happening to the Shendish site (HH-h3) under this option.</p> <p>With any development set for Kings Langley and the surrounding areas, I am worried about what, and how great a impact it will have on the current infrastructure. The village itself is already very busy due an expanding village population and this can be observed when looking at the build up of vehicle traffic each day at the M25-end of the high street - there is often a bottle neck of vehicles here. I also don't think the already oversubscribed local schools and the The Nap GP surgery would be able to sufficiently cope with the amount of extra people needing to use these services. The GP surgery is highly difficult to get an appointment as it is! A good example of where new houses have been built and the infrastructure not coping is the housing estate on Red Lion Lane near</p>

	<p>Abbots Hill school - there are a great number of vehicles parked half on the pavement due to parking provisions not being properly taken into account in the early stages.</p> <p>Aside from the impending infrastructure problems, any big development that affects the countryside feel of the village and it's green spaces could severely detract people from moving to the area and cause many to move away as it becomes more town-like and loses touch with it's history. Many people enjoy walking along the public footpaths that cut through Wayside Farm and other areas due to it's scenery and Jersey Cow herd.</p> <p>During the 24 years I have lived in the village I've noticed more and more that the village is losing it's charm and draw to families. Gone are the days where you could let children play outside their homes; too much and too fast moving traffic. Further development will only serve to concrete this problem for ever and create more.</p> <p>I hope my arguments have had some affect and will be taken into account when deciding how to develop Kings Langley.</p>
Include files	
Number	Question 46
ID	LPIO19873
Full Name	Chris Ansell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Of all the options, obviously Option 1A is the most appropriate as I understand the council has to meet government house building targets and this option would do so without greatly impacting the lovely views and green spaces offered by Kings Langley. I do, however, want to stress that whilst agreeing with Option 1A, I don't agree with any development happening to the Shendish site (HH-h3) under this option
Include files	
Number	Question 46
ID	LPIO19874
Full Name	Wallace and Carole Freed
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

We have been residents of Kings Langley for nearly 20 years and really enjoy being part of a thriving community in a lovely village.

We both understand that housing is vital to provide homes in our area but not on the scale that is proposed.

1 Kings Langley is a busy village and is a thoroughfare for people travelling from Apsley and Hemel Hempstead on the A4251 towards the M25 and A41 and Watford and surrounding area. The traffic has increased dramatically since we first came here and is now unbearable. The school traffic also adds to the congestion with coaches and buses and cars (where parents are bringing children to the schools from other areas). This is worsened because we don't have a satisfactory public transport system in the village. Everybody drives a car. Getting to Watford General is always a nightmare and takes much longer than it ever did. Visiting the vet in Watford takes over an hour in the rush hour and the vet is only at Cassiobury.

1 Kings Langley has character and special historical and medieval history. We need to keep Kings Langley as a village. Otherwise we will lose our character and identity and join up to be a coalescence with Hemel and Watford.

1 There is an abundance of wildlife living in the surrounding area of Kings Langley which must be preserved.

1 The national planning policy framework states that the green belt should serve the following purposes :

- (a) Check restricted sprawl of large built up areas
- (b) Prevent neighbouring towns merging into one another
- (c) Assist in safeguarding countryside from encroachment.
- (d) Preserve setting and special character of historic towns.

The proposals to build on 4 sites in Kings Langley are all in the green belt and therefore the above are all relevant.

1 Wayside Farm is one of only 2 dairy farms locally. The proposal to build offices and/or anything between 100 and 2,000 houses is abhorrent. The land is owned by Hertfordshire County Council and the farmer Charlie Wray is only a tenant. However he also runs the farm shop, sells raw milk to many local people and is a pillar of the community.

	<p>Furthermore, there are several empty office buildings in the vicinity which have been empty for some time.</p> <p>6, The sites at Hill Farm and Rectory Farm would both extend the village on the north-east corner and the north-west corner thus enlarging the village.</p> <p>1 The proposal to develop Shendish would extend Hemel Hempstead South to Rucklers Lane. Rucklers Lane is a difficult junction and the access road to Shendish is very narrow and winding and is difficult now when accessing the golf club.</p> <p>DBC should be looking at brownfield sites only. There is a very interesting article in The Times today (December 12) The Government says that it has a “brownfield first” policy when identifying land for more homes. To help to achieve this it has ordered all councils in England to publish registers by the end of this month of brownfield land suitable for development.</p> <p>In October Sajid Javid, the communities secretary said on <i>The Andrew Marr Show</i> on BBC One “I don’t believe that we need to focus on the green belt, there is lots of brownfield land and brownfield first has been a policy of ours for a while”.</p>
Include files	
Number	Question 46
ID	LPIO19876
Full Name	Wallace and Carole Freed
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The sites at Hill Farm and Rectory Farm would both extend the village on the north-east corner and the north-west corner thus enlarging the village.
Include files	
Number	Question 46
ID	LPIO19877
Full Name	Wallace and Carole Freed
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The sites at Hill Farm and Rectory Farm would both extend the village on the north-east corner and the north-west corner thus enlarging the village.
Include files	
Number	Question 46
ID	LPIO19878
Full Name	Wallace and Carole Freed
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Wayside Farm is one of only 2 dairy farms locally. The proposal to build offices and/or anything between 100 and 2,000 houses is abhorrent. The land is owned by Hertfordshire County Council and the farmer Charlie Wray is only a tenant. However he also runs the farm shop, sells raw milk to many local people and is a pillar of the community. Furthermore, there are several empty office buildings in the vicinity which have been empty for some time.
Include files	
Number	Question 46
ID	LPIO19879
Full Name	Wallace and Carole Freed
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	The proposal to develop Shendish would extend Hemel Hempstead South to Rucklers Lane. Rucklers Lane is a difficult junction and the access road to Shendish is very narrow and winding and is difficult now when accessing the golf club.
Include files	
Number	Question 46
ID	LPIO19880
Full Name	John Rogers
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 following are my comments on the proposed developments in Bovingdon.</p> <p>The principal problem with further substantial development in Bovingdon is the village's lack of infrastructure and the difficulty of improving on that infrastructure given Bovingdon's historic layout. The pressure of traffic on Bovingdon's High Street has been challenging for sometime now. Traffic is frequently snarled in the vicinity of the village centre. There is inadequate parking and pedestrians and other road users are often put at considerable risk. Daytime deliveries to local shops are a particular problem. Lorries making deliveries to both the Co-op and Bovingdon Stores result in considerable congestion. School dropping off and picking up times are a nightmare. The lack of enforcement of double yellow lines means parking can be out of control.</p> <p>The operation of Bovingdon Airfield's Saturday Market continues to result in heavy traffic and frequent jams on Box Lane and can result in Bovingdon residents being virtually restricted to the village. Access for emergency vehicles is compromised.</p> <p>Substantial development beyond the 90 homes already agreed would be very detrimental to the health and well-being of Bovingdon's current population. Of the developments outlined, BOV-h1 Grange Farm would be particularly problematic. Access to the village centre other than by car would be poor and notable existing Green Belt would be lost. Access onto Green Lane from h2 and h3 proposals would also be very detrimental for all the reasons stated above</p>
Include files	
Number	Question 46
ID	LPIO19881
Full Name	John Rogers
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 following are my comments on the proposed developments in Bovingdon.</p> <p>The principal problem with further substantial development in Bovingdon is the village's lack of infrastructure and the difficulty of improving on that infrastructure given Bovingdon's historic layout. The pressure of traffic on Bovingdon's High Street has been challenging for sometime now. Traffic is frequently</p>

	<p>snarled in the vicinity of the village centre. There is inadequate parking and pedestrians and other road users are often put at considerable risk. Daytime deliveries to local shops are a particular problem Lorries making deliveries to both the Co-op and Bovingdon Stores result in considerable congestion. School dropping off and picking up times are a nightmare. The lack of enforcement of double yellow lines means parking can be out of control.</p> <p>The operation of Bovingdon Airfield's Saturday Market continues to result in heavy traffic and frequent jams on Box Lane and can result in Bovingdon residents being virtually restricted to the village. Access for emergency vehicles is compromised.</p> <p>Substantial development beyond the 90 homes already agreed would be very detrimental to the health and well-being of Bovingdon's current population. Of the developments outlined, BOV-h1 Grange Farm would be particularly problematic. Access to the village centre other than by car would be poor and notable existing Green Belt would be lost. Access onto Green Lane from h2 and h3 proposals would also be very detrimental for all the reasons stated above</p>
Include files	
Number	Question 46
ID	LPIO19882
Full Name	John Rogers
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 following are my comments on the proposed developments in Bovingdon.</p> <p>The principal problem with further substantial development in Bovingdon is the village's lack of infrastructure and the difficulty of improving on that infrastructure given Bovingdon's historic layout. The pressure of traffic on Bovingdon's High Street has been challenging for sometime now. Traffic is frequently snarled in the vicinity of the village centre. There is inadequate parking and pedestrians and other road users are often put at considerable risk. Daytime deliveries to local shops are a particular problem Lorries making deliveries to both the Co-op and Bovingdon Stores result in considerable congestion. School dropping off and picking up times are a nightmare. The lack of enforcement of double yellow lines means parking can be out of control.</p> <p>The operation of Bovingdon Airfield's Saturday Market continues to result in heavy traffic and frequent jams on Box Lane and can result in Bovingdon residents being virtually restricted to the village. Access for emergency vehicles is compromised.</p>

	Substantial development beyond the 90 homes already agreed would be very detrimental to the health and well-being of Bovingdon's current population. Of the developments outlined, BOV-h1 Grange Farm would be particularly problematic. Access to the village centre other than by car would be poor and notable existing Green Belt would be lost. Access onto Green Lane from h2 and h3 proposals would also be very detrimental for all the reasons stated above
Include files	
Number	Question 46
ID	LPIO19883
Full Name	John Rogers
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 following are my comments on the proposed developments in Bovingdon.</p> <p>The principal problem with further substantial development in Bovingdon is the village's lack of infrastructure and the difficulty of improving on that infrastructure given Bovingdon's historic layout. The pressure of traffic on Bovingdon's High Street has been challenging for sometime now. Traffic is frequently snarled in the vicinity of the village centre. There is inadequate parking and pedestrians and other road users are often put at considerable risk. Daytime deliveries to local shops are a particular problem. Lorries making deliveries to both the Co-op and Bovingdon Stores result in considerable congestion. School dropping off and picking up times are a nightmare. The lack of enforcement of double yellow lines means parking can be out of control.</p> <p>The operation of Bovingdon Airfield's Saturday Market continues to result in heavy traffic and frequent jams on Box Lane and can result in Bovingdon residents being virtually restricted to the village. Access for emergency vehicles is compromised.</p> <p>Substantial development beyond the 90 homes already agreed would be very detrimental to the health and well-being of Bovingdon's current population. Of the developments outlined, BOV-h1 Grange Farm would be particularly problematic. Access to the village centre other than by car would be poor and notable existing Green Belt would be lost. Access onto Green Lane from h2 and h3 proposals would also be very detrimental for all the reasons stated above</p>
Include files	
Number	Question 46
ID	LPIO19884

Full Name	Andrew King
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 in response to the Dacorum Local Plan.</p> <p>While accepting that there is a need to build some homes I do not accept that we need to build the numbers targeted for the South West Herts region and I very strongly object to home being built on Green Belt land in our area.</p> <p>My objections are as follows:-</p> <ul style="list-style-type: none"> • Brownfield sites. There are plenty of brownfield sites in the region especially in Hemel Hempstead and in Luton and many more in the Midlands and the North. These should be utilised first. • Local Services. The local services in Kings Langley are already overstretched. It takes weeks to see a nurse and even though the local dentist is private it is impossible to get appointments for many weeks. • Roads. The state of Hertfordshire's roads is a disgrace and the current road system cannot cope with the traffic volumes now. To get from the centre of Kings Langley to the M25 can take 25 minutes after 7.30am in the morning. The roads cannot take any more cars and there clearly is no money for new roads as the current roads are not maintained in any event. • Schools. The current state schools are over subscribed and thus will have no room for new arrivals. • Loss of amenity and wildlife. The rural sites earmarked for housing are havens for wildlife and provide crucial wildlife corridors. In addition we are part of an area of Outstanding Natural Beauty. The whole point of designating land Green Belt is to prevent urban sprawl by keeping land permanently open. The proposals to build on the open farmland from Apsley all the way down to the M25 would create exactly the urban sprawl that Green Belt policy seeks to avoid. <p>The government needs to seriously think again and stop destroying the South East. The Council should push back and build only on brownfield sites in the area of which there are many in Hemel, Berhamsted and Watford.</p>
Include files	
Number	Question 46
ID	LPIO19886
Full Name	Lena White and Clifford C Richardson
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 undersigned support 'Option 1A' and answering question 39</p> <p>The idea of building on the Green Belt would destroy the separation of Rucklers Lane and Hemel Hempstead and also fail to keep Kings Langley, which is a thriving village, and Hemel Hempstead apart.</p> <p>Under Option C, which the undersigned do not ascribe to would be overloading the infrastructure in regards to roads and also damage the character of Kings Langley.</p> <p>Kings Langley is a settlement /village and under this consultation document, if proceeded with, could turn a village into a small town, which would destroy the appearance, character and facilities of the village.</p> <p>Development of Hill Farm, which is at the very top of the village, far from its centre, would be totally unsustainable.</p> <p>We believe this is shown in the consultation document as being 'on the level' with Kings Langley Village ! but is in fact approached by three very steep hills , additional traffic would add chaos to the surrounding roads. The school area which is extremely busy in the school hours would become grid locked as the consultation document shows the access to this site being to and from Love Lane.</p> <p>The number of houses shown in the consultation document could each, have two cars and some three, which together with additional vehicles using the site result in up to two thousand vehicle movements a day, many of these at the rush hour.</p> <p>Additional traffic being funnelled down three roads each with steep inclines and finishing on the high street would also cause considerable delays.</p> <p>In the mornings it is difficult to get out of the village without long delays due to high volume of traffic and the same applies in the evenings with a heavy volume of traffic originating from the offices adjacent to Apsley station and Nash Mills estate</p> <p>In addition to this anybody from new dwellings needing to use the facilities of the village in the high street, would more than likely use a car rather than walk, knowing that the return would involve a long walk up either of the three roads with steep climbs, difficult for persons pushing prams, elderly people etc, which would increase the problems with, an already overloaded, parking situation.</p> <p>A new care home in the village, for which planning permission has been given, together with an application for an additional care home, plus further housing development which if successful, would also increase the amount of traffic trying to or using the limited parking space available.</p> <p>It should be noted that the development of the Nash Mill Estate has resulted in additional parking problems along</p>

	<p>Red Lion Road, so much that the local firemen say that they would have extreme difficulty in getting a fire tender through the maze of parked traffic</p> <p>This shows development permission being given prior to planning being arrange for a sustainable road system.</p> <p>The named site itself attracts a considerable amount of wild life, deer use this as a refuge whilst transiting the area, a colony of bats lives on the site, type unknown, but which can be seen in spring summer and autumn evenings. Fox, badger and other varied wildlife.</p> <p>Birds, a family of green woodpeckers has been resident for some years. This what 'green belt' facilitates for the local community.</p> <p>This note explains our complete opposition to this idea and to the removal of green belt land for housing</p>
Include files	
Number	Question 46
ID	LPIO19887
Full Name	Lena White and Clifford C Richardson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Development of Hill Farm, which is at the very top of the village, far from its centre, would be totally unsustainable.</p> <p>We believe this is shown in the consultation document as being 'on the level' with Kings Langley Village ! but is in fact approached by three very steep hills , additional traffic would add chaos to the surrounding roads. The school area which is extremely busy in the school hours would become grid locked as the consultation document shows the access to this site being to and from Love Lane.</p> <p>The number of houses shown in the consultation document could each, have two cars and some three, which together with additional vehicles using the site result in up to two thousand vehicle movements a day, many of these at the rush hour.</p> <p>Additional traffic being funnelled down three roads each with steep inclines and finishing on the high street would also cause considerable delays.</p>
Include files	
Number	Question 46
ID	LPIO19890
Full Name	Jamie and Jude Grey
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 are concerned home owners in central Berkhamsted and would like to sum up our opinions as follows: -</p> <ul style="list-style-type: none"> - Berkhamsted is in a valley which means the the central area cannot expand to accommodate the needs of a greatly expanded population. <ul style="list-style-type: none"> i.e Traffic, doctors surgeries, schools, parking, shops. - Berkhamsted is ahead of the previously agreed expansion plans and should not be penalised for this. - Not all the brownfield sites have been used for development. - Greenbelt land should not be used for development. <p>Our conclusion is that Hemel Hempstead is much more suitable for expansion but ideally, new towns should be the solution.</p>
Include files	
Number	Question 46
ID	LPIO19899
Full Name	Chris 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 am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>Summary Section from GFRA – Executive summary</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</p>

	allocation given the appropriate requirements for the Borough and Tring itself. GFRA full document attached
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19946
Full Name	Chris 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 am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>GFRA Response to Question 46, full document attached to question 46</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 "Gorhambury Land at East Hemel Hempstead" (East Hemel Hempstead) 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".
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO19948
Full Name	Chris 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 am against this development because of the pressure on the infrastructure of Tring, I am also concerned about that effect it will have on traffic and wildlife in the area as it is greenbelt land. (Response GFRA)</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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</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]
- *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.²¹ 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 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	LPIO19956
Full Name	mrs sue van rhee
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 attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20003
Full Name	mrs sue van rhee
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 attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>GFRA Response to Question 46, full document attached to question 46</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,</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 "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:</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	LPIO20005
Full Name	mrs sue van rhee
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 attached the document produced on behalf of the Grove Fields Residents Association, which details how strongly we feel about the proposed developments on Green belt land and without the appropriate supporting infrastructure..</p> <p>GFRA Response to Question 46, full document attached to question 46</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</p>

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.²¹ 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.

	<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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20013
Full Name	Kate and Ben Marston
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 residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>Summary Section from GFRA – Executive summary</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</p>

	allocation given the appropriate requirements for the Borough and Tring itself. GFRA full document attached
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20060
Full Name	Kate and Ben Marston
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 residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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</p>

	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	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20062
Full Name	Kate and Ben Marston
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 residents of New Mill, Tring, my husband and I would like to register our response to the Grove Fields Residents Association Report (attached).</p> <p>We agree with the recommendation of the association and Tring Town Council that location TR-HR (Dunsley) is the preferred site for new housing, playing fields and employment site.</p> <p>GFRA Response to Question 46, full document attached to question 46</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> (East Hemel Hempstead) 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>

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.²¹ 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 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	LPIO20070

Full Name	Maurice and Christine O'Keefe
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 are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20118
Full Name	Maurice and Christine O'Keefe
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 are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p>

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.²¹ 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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20119
Full Name	Maurice and Christine O'Keefe
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 are members of the Grove Fields Residents Association and attach below our consultant's response to your planning consultation document.</p> <p>We are all on complete agreement with the findings of this report.</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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	LPIO20127
Full Name	Sherry and Haydn Bond
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 attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20157
Full Name	Sherry and Haydn Bond
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 attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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>

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.²¹ 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 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	LPIO20175

Full Name	Sherry and Haydn Bond
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 attached a copy of the issues report for Tring.</p> <p>We love living and raising our family in a small market town.</p> <p>We believe the expansions planned will make Tring a difficult place to live and thrive.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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	LPIO20177

Full Name	Mr Ian Whinnett
Company / Organisation	The Friends Of The Hertfordshire Way
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Hertfordshire Way is a 195 mile fully waymarked footpath around the picturesque county of Hertfordshire .</p> <p>Our attention has been drawn to proposed development of Land to the East of Wayside Farm at Kings Langley .It would appear that if implemented this would seriously affect this part of The Hertfordshire Way .</p> <p>In the circumstances I feel sure that you will not be surprised that we would wish to make our views known .</p> <p>I would be grateful if you could clarify to whom we should direct our objection and if any date has been set by which such communication should be received</p> <p>Further to my E-mail of 11th December 2017, I confirm our objection to the proposed development on Land to the East of Wayside Farm at Kings Langley. As previously stated this would appear to obstruct the route of The Hertfordshire Way.</p> <p>Whilst we appreciate the need for more housing, we feel that this would spoil an attractive valley.</p> <p>Should permission be granted for this development we ask that you provide an alternate footpath nearby</p>
Include files	
Number	Question 46
ID	LPIO20185
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The</p>

	<p>local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20233
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member.</p> <p>I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p>

In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.

Thank you

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".

Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20234
Full Name	Dianne Pilkington
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>To whom it may concern,</p> <p>I am attaching a report commissioned by the Grove Fields Residents Association of which I am a member. I do not believe that the Town of Tring can take a huge increase in population:</p> <p>The schools cannot cope in particular the Secondary school which is already needing to expand to accommodate children already in Tring.</p> <p>The station of Tring serves all surrounding villages and is located outside of the town requiring transport. The local bus service is not sufficient and the car park full by 8 am.</p> <p>In short, as a historic Market Town Tring thrives, but will be irreversibly damaged if over developed. Proper consideration needs to be taken regarding using green belt land which has not been taken. There is not the correct infrastructure in place and I don't believe Tring could support it.</p> <p>Thank you</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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.
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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.²¹ 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 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	LPIO20280
Full Name	Mr Peter Brown
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 seen the submission to DBC by the Berkhamsted Residents Action Group (BRAG), the contents of which I support.</p> <p>My own views, based both on being a long term resident of the town, and a Chartered Surveyor with broad experience of local development plans, can be summarised as:</p> <ul style="list-style-type: none"> • This is a modest market town, of linear shape because of it's position in a valley with relatively steep sides, where most of the residential development is on these slopes. The town is already saturated in terms of the traffic loads on the road network, and car parking availability. I know that the often quoted argument is that residents should rely less on their cars, and walk or cycle to the town hub. However, this is a fallacious argument as a serious point, in a town with the topography that we have. • In addition to this aspect of the infrastructure, the other key infrastructure issues that are of particular relevance are the capacity of the railway station and trains, and the secondary schools. • The process that has driven the consultation is the 'call for sites' approach. This is fundamentally flawed as a way of identifying the right level of development to match the resources of the town to absorb it. It inevitably leads to the submission of land that would otherwise, in a less pressured environment, be rejected as unsuitable in terms of scale and location, and it's designation as Green Belt land. The owners of the sites are encouraged to believe that Green Belt status is no longer important and relevant, and it is a matter of serious concern that the local planning authority have done little to discourage this view. • It seems to me that anything other than option 1b would represent a gross overdevelopment of Berkhamsted, to the extent that it would have a disastrous effect on the town's character as a historic market town. • I understand that in the first 10 years of the current Core Strategy, Berkhamsted has contributed a scale of residential development which exceeds it's set target by over a third, whereas Hemel Hempstead has contributed a scale of development of 20% less than it's envisaged target over the same period. It is time that this imbalance was addressed in the form of additional development in Hemel, and particularly of brownfield land where available.

- For these principal reasons, I request that Option 1b is chosen as the agreed response of DBC to the choices facing the Borough, and that before any development is approved, a plan for necessary infrastructure improvement agreed.

BRAG response to Question 46 (full document is attached)

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 BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending 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
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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

	<p>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>
Include files	BRAG response to Issues Options.pdf

Number	Question 46
ID	LPIO20288
Full Name	David Clarke
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 attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe 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>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20335
Full Name	David Clarke

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 attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe 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>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20337
Full Name	David Clarke
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 attached report was provided to me by the Grove Fields Residents Association. I have reviewed the proposals outlined in the Issues and Options Consultation Local Plan to 2036 Paper, and I believe that the attached report captures the key concerns extremely well. I fully support the points raised in this report and would ask that you carefully consider them before progressing any further. In summary, I do not believe the proposals have been sufficiently thought through and in particular I believe that the fields referred to as "Grove Fields" is clearly unsuitable for residential development. I also believe 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>Please accept this email and the attached report as my feedback on the proposed development of Tring.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>

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.²¹ 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

	<p>"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.</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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20338
Full Name	Deborah Turnbull
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Whilst I agree that there is the need for more housing 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 worse 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> <ol style="list-style-type: none"> 1 Infrastructure – housing – there is no doubt that additional housing is required but it needs to be proportional, sustainable, in the right place and affordable for local families. 2 Over Development of Tring – some of the proposals seek to increase the size of Tring by over 50%. Tring is a small market town and a massive influx of people, on top of the already planned 500 housing, would change the character of the town. Block developments tend to be bad for towns, in terms of changing the character of a town. 3 Infrastructure – Roads – there is already gridlock in the High Street at certain times of day. There does not appear to be any thought as to whether the road system can cope. There has been considerable expansion of Aylesbury and with planned housing in the soon to be decommissioned RAF Halton there is already pressure on the local roads. Who will plan and pay for any required changes?

- 4 Infrastructure – Schools – there does not appear to have been any consideration as to the lack of school places within the town. The local primary schools are full, without taking into account the housing that is being built and the planned 250 odd houses at the top of the Icknield Way (LA5). The secondary school is already one of the largest in Hertfordshire and as mentioned at the planning meeting in Tring there is recognised to be the need for more school places within Tring and if any large scale development were to take place then a new secondary school would be required to be shared between Tring and Berkhamsted but that no site had been identified. This would undoubtedly change the character of the town as at present, with the one school, there is a sense of a common purpose and a generally true comprehensive schooling system with the vast majority of the children in the town attending the one school.
- 5 Use of Greenbelt land – the Greenbelt was introduced for a reason; to be a barrier between built up areas and the countryside and to ensure that this was maintained. The reasons for its introduction are still relevant today and perhaps even more relevant with the stresses of modern life. Tring is set in the Chilterns, in an Area of Outstanding Natural Beauty, and surrounded by Greenbelt land – why are Dacorum considering building on Greenbelt? There needs to be a buffer between the AONB and built up areas. I believe that the Greenbelt should have the highest level of statutory protection.
- 6 Infrastructure – medical facilities – has any consideration been given to lack of doctors and where residents will be able to receive hospital treatment. With the expansion of Aylesbury, there is a lot of pressure on services at Stoke Mandeville and most people from Tring use this as it is more accessible than the alternative within Hertfordshire, being Watford Hospital, which at certain times of day takes a long time to get to.
- 7 Infrastructure – water and sewage – with Tring being at the summit of the Grand Union canal - there are already water shortages at Tring Station with residents being subject to restriction on supply. What consideration has been given to this in the plans?
- 8 Affordability – the need for affordable housing for local families of Tring, especially young people, need to be considered. What consideration is being given in the plan to ensure the ongoing viability of the town to prevent it becoming an old peoples' town? To ensure the ongoing viability of the town and keep it multi-generational there needs to be affordable housing for young families.
- 9 Infrastructure – parking – there is already considerable pressure on parking at certain times. Additional housing would make this problem worse. How is it proposed that the town would cope with all the additional traffic.
- 0 Local jobs and services – there does not appear to be any thought as to providing local jobs and

	<p>services for any proposed residents. Whilst brown field sites appear to be an easy option there needs to be consideration for local jobs. What local industry is there being made provision for?</p> <ol style="list-style-type: none"> 1 Infrastructure – leisure/community space – what provision is there being made to ensure that sufficient space is allocated for leisure and community pursuits? 2 Tring as a town is already short of open areas within the built up area and spaces for small industry to ensure the ongoing viability of the town. 3 The local plan just seems to have slot housing on the edge of the town with no regard for the character nor infrastructure capabilities of the town. What considerations were given in the proposed allocation of land for housing? 4 How have the number of additional housing needs been calculated? Where has this need been identified as coming from? 5 The adverse affect of over development on the well being of the residents of Tring through over population should not be diminished or under estimated. <p>Thank you for taking my opinions into account when developing the new Local Plan for Dacorum.</p>
Include files	
Number	Question 46
ID	LPIO20346
Full Name	Deborah Turnbull
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 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>Whilst I agree that there is the need for more housing 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 worse case scenario of the plan were to take place this would result in a 60% increase of the town of Tring.</p> <ol style="list-style-type: none"> 1 Infrastructure – housing – there is no doubt that additional housing is required but it needs to be proportional, sustainable, in the right place and affordable for local families. 2 Over Development of Tring – some of the proposals seek to increase the size of Tring by over 50%. Tring is a small market town and a massive influx of people, on top of the already

planned 500 housing, would change the character of the town. Block developments tend to be bad for towns, in terms of changing the character of a town.

- 3 Infrastructure – Roads – there is already gridlock in the High Street at certain times of day. There does not appear to be any thought as to whether the road system can cope. There has been considerable expansion of Aylesbury and with planned housing in the soon to be decommissioned RAF Halton there is already pressure on the local roads. Who will plan and pay for any required changes?
- 4 Infrastructure – Schools – there does not appear to have been any consideration as to the lack of school places within the town. The local primary schools are full, without taking into account the housing that is being built and the planned 250 odd houses at the top of the Icknield Way (LA5). The secondary school is already one of the largest in Hertfordshire and as mentioned at the planning meeting in Tring there is recognised to be the need for more school places within Tring and if any large scale development were to take place then a new secondary school would be required to be shared between Tring and Berkhamsted but that no site had been identified. This would undoubtedly change the character of the town as at present, with the one school, there is a sense of a common purpose and a generally true comprehensive schooling system with the vast majority of the children in the town attending the one school.
- 5 Use of Greenbelt land – the Greenbelt was introduced for a reason; to be a barrier between built up areas and the countryside and to ensure that this was maintained. The reasons for its introduction are still relevant today and perhaps even more relevant with the stresses of modern life. Tring is set in the Chilterns, in an Area of Outstanding Natural Beauty, and surrounded by Greenbelt land – why are Dacorum considering building on Greenbelt? There needs to be a buffer between the AONB and built up areas. I believe that the Greenbelt should have the highest level of statutory protection.
- 6 Infrastructure – medical facilities – has any consideration been given to lack of doctors and where residents will be able to receive hospital treatment. With the expansion of Aylesbury, there is a lot of pressure on services at Stoke Mandeville and most people from Tring use this as it is more accessible than the alternative within Hertfordshire, being Watford Hospital, which at certain times of day takes a long time to get to.
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- 8 Affordability – the need for affordable housing for local families of Tring, especially young people,

need to be considered. What consideration is being given in the plan to ensure the ongoing viability of the town to prevent it becoming an old peoples' town? To ensure the ongoing viability of the town and keep it multi-generational there needs to be affordable housing for young families.

- 9 Infrastructure – parking – there is already considerable pressure on parking at certain times. Additional housing would make this problem worse. How is it proposed that the town would cope with all the additional traffic.
- 0 Local jobs and services – there does not appear to be any thought as to providing local jobs and services for any proposed residents. Whilst brown field sites appear to be an easy option there needs to be consideration for local jobs. What local industry is there being made provision for?
- 1 Infrastructure – leisure/community space – what provision is there being made to ensure that sufficient space is allocated for leisure and community pursuits?
- 2 Tring as a town is already short of open areas within the built up area and spaces for small industry to ensure the ongoing viability of the town.
- 3 The local plan just seems to have slot housing on the edge of the town with no regard for the character nor infrastructure capabilities of the town. What considerations were given in the proposed allocation of land for housing?
- 4 How have the number of additional housing needs been calculated? Where has this need been identified as coming from?
- 5 The adverse affect of over development on the well being of the residents of Tring through over population should not be diminished or under estimated.

Thank you for taking my opinions into account when developing the new Local Plan for Dacorum.

Summary Section from GFRA – Executive summary

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.

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.

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.

GFRA full document attached

Include files

[GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf](#)

Number	Question 46
ID	LPIO20393
Full Name	Deborah Turnbull
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 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>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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	LPIO20395

Full Name	Deborah Turnbull
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 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>Whilst I agree that there is the need for more housing 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 worse case scenario of the plan were to take place this would result in a 60% increase of the town of Tring.</p> <ol style="list-style-type: none"> 1 Infrastructure – housing – there is no doubt that additional housing is required but it needs to be proportional, sustainable, in the right place and affordable for local families. 2 Over Development of Tring – some of the proposals seek to increase the size of Tring by over 50%. Tring is a small market town and a massive influx of people, on top of the already planned 500 housing, would change the character of the town. Block developments tend to be bad for towns, in terms of changing the character of a town. 3 Infrastructure – Roads – there is already gridlock in the High Street at certain times of day. There does not appear to be any thought as to whether the road system can cope. There has been considerable expansion of Aylesbury and with planned housing in the soon to be decommissioned RAF Halton there is already pressure on the local roads. Who will plan and pay for any required changes? 4 Infrastructure – Schools – there does not appear to have been any consideration as to the lack of school places within the town. The local primary schools are full, without taking into account the housing that is being built and the planned 250 odd houses at the top of the Icknield Way (LA5). The secondary school is already one of the largest in Hertfordshire and as mentioned at the planning meeting in Tring there is recognised to be the need for more school places within Tring and if any large scale development were to take place then a new secondary school would be required to be shared between Tring and Berkhamsted but that no site had been identified. This would undoubtedly change the character of the town as at present, with the one school, there is a sense of a common purpose and a generally true comprehensive

- schooling system with the vast majority of the children in the town attending the one school.
- 5 Use of Greenbelt land – the Greenbelt was introduced for a reason; to be a barrier between built up areas and the countryside and to ensure that this was maintained. The reasons for its introduction are still relevant today and perhaps even more relevant with the stresses of modern life. Tring is set in the Chilterns, in an Area of Outstanding Natural Beauty, and surrounded by Greenbelt land – why are Dacorum considering building on Greenbelt? There needs to be a buffer between the AONB and built up areas. I believe that the Greenbelt should have the highest level of statutory protection.
 - 6 Infrastructure – medical facilities – has any consideration been given to lack of doctors and where residents will be able to receive hospital treatment. With the expansion of Aylesbury, there is a lot of pressure on services at Stoke Mandeville and most people from Tring use this as it is more accessible than the alternative within Hertfordshire, being Watford Hospital, which at certain times of day takes a long time to get to.
 - 7 Infrastructure – water and sewage – with Tring being at the summit of the Grand Union canal - there are already water shortages at Tring Station with residents being subject to restriction on supply. What consideration has been given to this in the plans?
 - 8 Affordability – the need for affordable housing for local families of Tring, especially young people, need to be considered. What consideration is being given in the plan to ensure the ongoing viability of the town to prevent it becoming an old peoples' town? To ensure the ongoing viability of the town and keep it multi-generational there needs to be affordable housing for young families.
 - 9 Infrastructure – parking – there is already considerable pressure on parking at certain times. Additional housing would make this problem worse. How is it proposed that the town would cope with all the additional traffic.
 - 0 Local jobs and services – there does not appear to be any thought as to providing local jobs and services for any proposed residents. Whilst brown field sites appear to be an easy option there needs to be consideration for local jobs. What local industry is there being made provision for?
 - 1 Infrastructure – leisure/community space – what provision is there being made to ensure that sufficient space is allocated for leisure and community pursuits?
 - 2 Tring as a town is already short of open areas within the built up area and spaces for small industry to ensure the ongoing viability of the town.
 - 3 The local plan just seems to have slot housing on the edge of the town with no regard for the character nor infrastructure capabilities of the town. What considerations were given in the proposed allocation of land for housing?

- 4 How have the number of additional housing needs been calculated? Where has this need been identified as coming from?
- 5 The adverse affect of over development on the well being of the residents of Tring through over population should not be diminished or under estimated.

Thank you for taking my opinions into account when developing the new Local Plan for Dacorum

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.²¹ 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 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> <p>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.</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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20441
Full Name	Jane Collis
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 express my support of option 1B and endorse BRAG's response to the DBC proposals as per the attached. I am concerned by the key features of other options, as follows:</p> <ul style="list-style-type: none"> • The impact of new housing on the green belt • Lack of infrastructure particularly roads, parking, schools and GP surgeries • The basis for DBC's numbers and assumptions

- The lack of affordable housing in the plans
- Increased congestion in the town, particularly in the centre

The linear nature of Berkhamsted's town centre and its inability to expand public amenity to support a much greater population is one of the key reasons for my lack of support of other options proposed by DBC. DBC's investment in our town centre has been negligible for decades. Investment by DBC in public space, cultural and community amenity in the town centre is already necessary and long overdue to meet the needs of the existing population, never mind that of a much expanded town.

BRAG response to Question 46 (full document is attached)

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/2007/06/20/DBC-Green-Belt-Review-FOSM.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 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
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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
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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"> • Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending 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	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO20443
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>1 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>1 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, schools, medical services and transport. I do not see that it is in anyway achievable or sustainable without massive coordinated expenditure and joined up thinking with adjoining local authority areas. There are better places within the borough in which the proposed expansion can and should be accommodated.</p> <p>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 sensitive that that to the Eastern side. To do otherwise would cause significant harm to the surrounding countryside and how the settlements sits within the landscape. 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>
Include files	
Number	Question 46
ID	LPIO20454
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>I am writing in response to the Issues and Options consultation.</p> <p>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.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p>

1 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.

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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 sensitive that that to the Eastern side. To do otherwise would cause significant harm to the surrounding countryside and how the settlements sits within the landscape. 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.

Summary Section from GFRA – Executive summary

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

	<p>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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20494
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>I am writing in response to the Issues and Options consultation.</p> <p>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.</p> <ol style="list-style-type: none"> 1 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.

- 1 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, schools, medical services and transport. I do not see that it is in anyway achievable or sustainable without massive coordinated expenditure and joined up thinking with adjoining local authority areas. There are better places within the borough in which the proposed expansion can and should be accommodated.

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 sensitive that that to the Eastern side. To do otherwise would cause significant harm to the surrounding countryside and how the settlements sits within the landscape. 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.

It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.

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.²¹ 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20503
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>I am writing in response to the Issues and Options consultation.</p> <p>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.</p> <p>It is a very detailed response to the questions set out in the consultation document and I hope will be given very careful consideration by the Council.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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	LPIO20550
Full Name	DR Brigitta Case
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 attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>The Need for Housing in Dacorum is understood although the way this has been quantified is unclear.</p> <p>The approach to planning should address the needs of the community as a whole and be joined up, allowing the community to grow in a way that is sustainable and does not destroy the character of the region. In particular, I am referring to the Historic Market towns of Berkhamsted and Tring, the surrounding Areas of Outstanding Natural Beauty and areas of Green Belt that make such an important contribution to the quality of life in Dacorum. In making any decisions it is essential to take into account the very varied geography, demography and topography within the Borough</p> <ul style="list-style-type: none"> • Berkhamsted is already committed to providing 600 further homes • In the first 10 years of the existing Core Strategy, development in Berkhamsted is already 34%

ABOVE target. Other areas are well below target (including Hemel Hempstead)

- There has been extensive infill in Berkhamsted over the years I have known it. This has progressed at a pace without the necessary improvements and updating of infrastructure. As a result – Berkhamsted is already buckling under the pressure of new housing to date – to summarise the stretched infrastructure – explained in more detail by others - we are talking about:
 - Roads – congested
 - Pollution – already at unacceptable levels at peak times
 - Parking
 - Drains
 - Schools – I understand a new secondary school is proposed but no mention of where it could go
 - GP surgeries –
 - Hospital provision –
 - Social care and social housing –

As a retired GP, I feel particularly passionate about the last three points above. Our health provision is poor in the region and especially in Berkhamsted. GPs are terribly overstretched. The loss of emergency services in Hemel for this population is frankly shocking. I am one of many in support of the building of a new state of the art hospital to support our expanding population.

This brings me onto my last few major points which refer specifically to Berkhamsted:

Topography

Berkhamsted is a linear town in a valley. Both sides are steep. The areas proposed for new development are largely at the top of the hills on either side! Living in these locations will not be conducive to walking or cycling into town. The inevitable increase in traffic will only add to the problems listed at the foot of the previous page.

Impact of housing nearby

I also do not believe that the planners have taken into account the impact of other developments close to Berkhamsted– in particular, the 1150 houses on the Potten End side of Old Hemel and 350 more behind Piccotts End which are likely to bring a significant amount of traffic into Berkhamsted with consequent impact on roads, parking etc

BRAG response below and attached full document - and Berkhamsted Citizens responses to this question are on next Q46 response LPIO20551 - with the full document

BRAG response to Question 46 (full document is attached)

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 clearly stated in the DBC Guide to Review of DBC)~~

(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.
- 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.

Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO20551
Full Name	DR Brigitta Case
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 attended several meetings, talked with Town Councillors and Dacorum Planners to better understand the Options outlined in the Core Strategy Plan for Dacorum.</p> <p>As a Berkhamsted resident who has enjoyed associations with the town for 50 years, I feel a responsibility to speak out and air my views – shared by many with whom I have spoken on this subject.</p> <p>The 46 Questions have been eloquently answered by many and I support the answers given by both the Berkhamsted Citizens' Association and the Berkhamsted Residents Action Group. It seems to me that there is much repetition of the points made and so I have opted to write in email/letter format to list and outline the main points I feel should be considered.</p> <p>The Need for Housing in Dacorum is understood although the way this has been quantified is unclear.</p> <p>The approach to planning should address the needs of the community as a whole and be joined up, allowing the community to grow in a way that is sustainable and does not destroy the character of the region. In particular, I am referring to the Historic Market towns of Berkhamsted and Tring, the surrounding Areas of Outstanding Natural Beauty and areas of Green Belt that make such an important contribution to the quality of life in Dacorum. In making any decisions it is essential to take into account the very varied geography, demography and topography within the Borough</p> <ul style="list-style-type: none"> • Berkhamsted is already committed to providing 600 further homes • In the first 10 years of the existing Core Strategy, development in Berkhamsted is already 34% ABOVE target. Other areas are well below target (including Hemel Hempstead) • There has been extensive infill in Berkhamsted over the years I have known it. This has progressed at a pace without the necessary improvements and updating of infrastructure. As a result – Berkhamsted is already buckling under the pressure of new housing to date – to summarise the stretched infrastructure – explained in more detail by others - we are talking about: • Roads – congested • Pollution – already at unacceptable levels at peak times

	<ul style="list-style-type: none"> • Parking • Drains • Schools – I understand a new secondary school is proposed but no mention of where it could go • GP surgeries – • Hospital provision – • Social care and social housing – <p>As a retired GP, I feel particularly passionate about the last three points above. Our health provision is poor in the region and especially in Berkhamsted. GPs are terribly overstretched. The loss of emergency services in Hemel for this population is frankly shocking. I am one of many in support of the building of a new state of the art hospital to support our expanding population.</p> <p>This brings me onto my last few major points which refer specifically to Berkhamsted:</p> <p>Topography</p> <p>Berkhamsted is a linear town in a valley. Both sides are steep. The areas proposed for new development are largely at the top of the hills on either side! Living in these locations will not be conducive to walking or cycling into town. The inevitable increase in traffic will only add to the problems listed at the foot of the previous page.</p> <p>Impact of housing nearby</p> <p>I also do not believe that the planners have taken into account the impact of other developments close to Berkhamsted– in particular, the 1150 houses on the Potten End side of Old Hemel and 350 more behind Piccotts End which are likely to bring a significant amount of traffic into Berkhamsted with consequent impact on roads, parking etc</p> <p>Berkhamsted Citizens response below and full document attached - BRAG response and attached full document - see LPIO20550</p>
Include files	Berkhamsted Citizens Response (DBC Strategic Plan).pdf
Number	Question 46
ID	LPIO20597
Full Name	Christine Manning
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 support the views put forward by the Berkhamsted Citizens Association in their response to the Core Strategy</p> <p>In particular, I support OPTION 1B as this uses the least green belt land.</p> <p>As a Berkhamsted resident I believe that we live in a valley town with one main road which is already clogged up with traffic and only narrow other entries to the town.</p>

We have inadequate parking – the new car park will already cause further traffic flow problems. We are restricted in growth or change to this due to the canal and station. We do not have the infrastructure to support more housing. Our streets are already congested and our doctors surgeries too busy. Any new housing results in more traffic flow down into the town centre to shop, go to schools, doctors etc.

Hemel Hempstead has more infrastructure having been expanded as a new town and is more suited to take new housing for the Dacorum area.

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 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.

1 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 backdrop against which any future development should be assessed.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 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.

1 BIODIVERSITY

	<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. http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/</p>
Include files	Berkhamsted Citizens Response (DBC Strategic Plan).pdf
Number	Question 46
ID	LPIO20612
Full Name	Ailsa Davis
Company / Organisation	HCC Development services, Property , Resources
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We make the following comment on the schedule of Site Appraisals and the Sustainability Appraisals Also please see our response to question 1.</p> <p><u>Dunsley Farm</u></p>

	<p>The sustainability appraisal correctly identifies that Dunsley Farm is the most sustainable location for growth in Tring if Green Belt development is identified as being required.</p> <p>Dunsley Farm is the closest site to Tring Town Centre.</p> <p>It offers the opportunity to facilitate economic growth through the expansion of existing business.</p> <p>It offers the potential to improve pedestrian and cycle permeability between the sports clubs in Cow Lane and the town centre.</p> <p>It offers the potential to improve education capacity if required.</p> <p>If education provision is made on the site it offers the opportunity to explore synergies with other community group aspirations</p> <p>The area of the site considered in the Schedule of Greenfield site assessments is arbitrarily constrained with no reasoned justification.</p> <p>The provision of education use/school playing fields would preserve the openness of the edge of the site in perpetuity.</p> <p>Landscape and visual impact assessment work has suggested two different deliverable scenarios are capable of being realised, including employment and residential development, together with a linear park.</p> <p>High level transport assessment advice has considered the highways capacity of the local road network assuming B1 (a) office use of the employment area, a new secondary school and approximately 250 houses. This work has concluded that there is capacity in the local highway network to accommodate development</p>
Include files	HCC - Dunsley Farm Supporting doc.pdf
Number	Question 46
ID	LPIO20613
Full Name	Ailsa Davis
Company / Organisation	HCC Development services, Property , Resources
Position	Principal Planning Officer
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Wayside Farm</u></p> <p>The site is in an accessible location close to Kings Langley railway station. The developable area of the site is constrained by the topography of the land.</p> <p>There are current issues of congestion and queuing traffic within Kings Langley High Street, and along the A4251/at junction 20 of the A41/M25.</p> <p>It is understood that traffic management improvements are proposed as part of the South West Hertfordshire Growth and Transport Plan – intended to alleviate these highways infrastructure issues It will be important to</p>

	<p>understand the potential efficacy of any measures proposed, together with the conclusions of any further transport modelling carried out as part of the Local Plan directions for growth going forwards.</p> <p>Until the efficacy of transport improvements and measures to alleviate congestion are properly understood, it is difficult to see how the Wayside Farm site could accommodate more than modest growth.</p> <p>The location is one which would be commercially attractive.</p> <p>We would welcome the opportunity of discussing these matters further with the Local Planning Authority.</p> <p>For both sites the high level transportation advice and the Landscape and Visual Impact Assessment and identification of potentially developable areas forms part of the separate representations which have been made in connection with the Call for Sites exercise 2017.</p> <p>e look forward to discussing both sites further with the Local Planning Authority at the appropriate time</p>
Include files	HCC - Wayside Farm supporting document.pdf
Number	Question 46
ID	LPIO20614
Full Name	Jane Hawkins
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 with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>From my point of view, Tring lacks the facilities to cope with more homes and therefore residents - the doctors are near to full, the primary schools are full as well as the secondary school and recently there has been a proposal to remove the petrol station. Even our supermarket will not be able to supply a large increase in numbers in Tring. If we do not have the ability to look after people correctly our market town will decline. There has been no proposal that includes improvements to any of these of essential services.</p> <p>With regards to the fields specifically on Grove Road, going down to Bulbourne Road, I am concerned that development specifically here will cause instability to the Victorian housing on Wingrave Road. It will affect the water table and flow and houses that have been here for years and years will be vulnerable.</p> <p>I realise houses need to be built however Tring is full to bursting. I realise that is not a technical term, however</p>

as a Tring resident I am concerned this vast development proposal will put too much pressure on our 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]
- 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.²¹ 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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20622
Full Name	Jane Hawkins
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 with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>From my point of view, Tring lacks the facilities to cope with more homes and therefore residents - the doctors are near to full, the primary schools are full as well as the secondary school and recently there has been a proposal to remove the petrol station. Even our supermarket will not be able to supply a large increase in numbers in Tring. If we do not have the ability to look after people correctly our market town will decline. There has been no proposal that includes improvements to any of these of essential services.</p>

	<p>With regards to the fields specifically on Grove Road, going down to Bulbourne Road, I am concerned that development specifically here will cause instability to the Victorian housing on Wingrave Road. It will affect the water table and flow and houses that have been here for years and years will be vulnerable.</p> <p>I realise houses need to be built however Tring is full to bursting. I realise that is not a technical term, however as a Tring resident I am concerned this vast development proposal will put too much pressure on our town.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20669
Full Name	Jane Hawkins
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 with regards to the proposed development of Tring.</p> <p>I am concerned this development has not been investigated correctly. Please see the attached file (GFRA full response)</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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	LPIO20678
Full Name	Keiron Wybrow
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 attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>I am against building large numbers of new houses anywhere in Tring when the town's current infrastructure cannot support those new families and so little thought seems to be going into creating a decent plan for Tring.</p> <p>It is important for us to house the population but please consider those families who have already built their lives</p>

	<p>here and enjoy the special balance that the Town currently has.</p> <p>I am also very concerned about possible plans to build on green belt land most especially the fields referred to as Grove Fields, as this green and open space means a great deal to myself and my family in terms of recreation as a place to go for walks and to be in a safe open space and also as a place where nature has at least some chance to thrive without cars driving over it or houses taking up all of the room</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20725
Full Name	Keiron Wybrow
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 attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>GFRA Response to Question 46, full document attached to question 46</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,</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 "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:</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	LPIO20727
Full Name	Keiron Wybrow
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 attached a response document as commissioned by Grove Fields Residents association which I am a member of.</p> <p>As well as this I would like to make my own personal feelings known.</p> <p>I am against building large numbers of new houses anywhere in Tring when the town's current infrastructure cannot support those new families and so little thought seems to be going into creating a decent plan for Tring.</p>

It is important for us to house the population but please consider those families who have already built their lives here and enjoy the special balance that the Town currently has.

I am also very concerned about possible plans to build on green belt land most especially the fields referred to as Grove Fields, as this green and open space means a great deal to myself and my family in terms of recreation as a place to go for walks and to be in a safe open space and also as a place where nature has at least some chance to thrive without cars driving over it or houses taking up all of the room

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.²¹ 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

	<p>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 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> <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, TR-H5 and TR-H6 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO20773
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)

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.

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.

The Place Strategy in Dacorum Borough Council's (DBC) Core Strategy summarises Tring today as:

"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".

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:

- Caring, generous people
- Vibrant with lots of clubs and societies
- Friendly – an outcome of a mystery shopping study in Tring
- Inclusive – a good mix of all ages
- Long term residents – the sense of belonging has been passed through the generations

Hence perpetuating that sense of community is the Town Council's prime objective. To achieve this means that the following trends must be addressed:

- The growth of internet shopping and the changing face of the High Street
 - A range of long established independent retailers have closed
 - The Town's last bank will close in June 2018
 - The edge-of-town supermarket has drawn shoppers away from the Town centre
- Recognising that the growth of car transport is unsustainable
 - Streets are clogged as practically every household has at least two cars
 - There is a lack of town centre car parking
 - Despite a large extension there is insufficient car parking at Tring Station
 - 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)
- The growth in house prices
 - is pushing away young families and threatening to unbalance the population
 - 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

- 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.
Include files	
Number	Question 46
ID	LPIO20774
Full Name	Christopher Townsend
Company / Organisation	
Position	Councillor, Tring Town Council
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 Tring Town Council I agree with all the responses that have been submitted by Tring Town Council (copy below)</p> <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"> • It is a large site offering mixed use: <ul style="list-style-type: none"> • Employment land • Sports facilities (adjacent to existing facilities) • Housing • 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” • It is closest to the town centre. This will make the task of integrating the growth with the existing community as easy as possible • It is a ‘constrained’ site with a natural boundary • It is a Town ‘Gateway’ so will need sympathetic development <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"> • 10 hectares allocated to housing (at 30 dwellings per hectare) • The Brewery, Farm shop, etc. take up less than 1 hectare • 15 hectares for sports facilities (based on Tring Sports Forum’s response anticipated need) • Employment – 7 hectares • Open Space – 4 hectares
Include files	
Number	Question 46
ID	LPIO20821
Full Name	Usha Kilich
Company / Organisation	Northchurch Parish Council
Position	Parish Clerk

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Be-h4 (see also residents response below)</p> <p>A high-density development in a prominent location at the top of the valley would create an adverse impact on the landscape and setting of the AONB.</p> <p>Increases in car usage, increase in congestion and pollution in the AQMA. No existing bus services. Substantial increase in traffic on Shooters Way. Difficulties of upgrading Darrs Lane and Bell Lane without detrimental environmental effects. Area of archaeological significance. Impact on the AQMA in Northchurch.</p> <p>A large number of residents in Darrs Lane, Bell Lane and Northchurch village are having growing concerns and are totally opposed to this possible development. (Read in conjunction with enclosed letter)</p> <p>Be-h5</p> <p>This site is currently being used as a service yard for Network Rail, it is almost a brown field site!</p> <p>Northchurch Parish Council would consider developments on this site if suitable traffic calming / traffic safety measures were introduced onto New road / canal bridge and Northchurch High street. Provided New Road is upgraded before development is started.</p> <p>Be-h8</p> <p>This site has poor road access with no public services, would create increased traffic on Shooters Way and Darrs Lane. Impact on local landscape which is in AONB</p> <p>Residents comments</p> <p>Please find below details of my concerns relating to the planning application, ref Be-h4, the land between Bell Lane and Darrs Lane.</p> <p>I was born and raised in Northchurch and have lived in Darrs Lane for 50 years and, as a mother of 4 children, none of whom have remained in the area, partially due to the cost of housing, I am fully aware of the need for affordable housing in the area.</p> <p>Having discussed this both my children and I feel that, if agreed, this development, in addition to the existing new developments locally, would spoil the nature and the charm of the village, as well as the surrounding countryside. This irreversible sacrifice would not be worth the number of homes created when there are other areas much more suitable.</p> <p>Over the years I have also seen a dramatic loss of hedgerows and wildlife because of the increased housing pressure. I feel that it is vitally important to retain the remaining area of natural beauty, habitats and green belt. The Herts Wildlife trust reports a number of species currently under threat due to the over development of the area. These include, amongst others, hedgehogs, the ringed plover, skylarks, the song thrush and the barbastelle bat. Once lost these are irreplaceable.</p>

The Government stance is that Green Belt should only be developed in very special circumstances with substantial weight given to any harm that a development would cause. Special circumstances are clearly not the case, in this instance, as there are many other sites that could be utilised. Even Dacorum's own consultants recommended that the areas Green Belt status be maintained.

Both Bell Lane and Darrs Lane are single track country lanes. There has already been an increase in traffic further to the building of the bypass, the hospice and the new Bearroc estate, with traffic backing up along Shootersway from the junction with Kings Road and in Darrs Lane. The lanes are already suffering from the number and size of vehicles using it. If permission is given for the proposed developments, the steep topography, the lack of public transport and the distance from facilities and services, would mean that additional pressure would be placed on the local roads / lanes.

250 new houses built would mean at least 300 additional cars, just from this development, plus those from the other developments in the Shootersway area.

There are any number of sites that could be developed that have better access to commuter and public transport links and to community services, GPS, schools etc which would negate the need for additional cars and the resulting traffic problems

As stated above I do fully understand the urgent need for housing in Dacorum but creating so many new properties in the Shootersway / Northchurch area is not the way forward. The plans seems to place a large percentage of the new developments in this area placing too much pressure on the village infrastructure, rather than the new developments being absorbed by the whole of Dacorum

I have been told that Berkhamsted, as a whole, and certainly the Shootersway area have more that fulfilled its obligations regarding the prescribed number of new homes when other areas have not. The need for new housing is, surely, in these areas and so the focus on development should also be there

A large number of residents in Darrs Lane, Bell Lane and in Northchurch village have raised similar concerns, I hope that I have made these clear and that they will be given due consideration by the planning committee. In summary we feel that, if agreed, the development will have a detrimental effect on the village character and the sense community in Northchurch. We are also extremely concerned about the effects a development of this size (and the rest of the proposed developments in the Shootersway area) will have on the already stretched infrastructure.

Include files

Number

Question 46

ID	LPIO20867
Full Name	Mr Iain 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 have also tapped into the support of Berkhamsted Residents Action Group and have attached much more detailed comments that have been put together by that group, all of which I support. These comments are rather long, but I feel it is important to repeat them in detail.</p> <p>I have lived in Berkhamsted for around 30 years and am fully appreciative of the assets of the town and how it should be a "living thing", with development that is appropriate and sensitive to the fact that the town sits within protected green belt as well as beautiful countryside. Consideration in development work should also significantly be given to the capacity of current key infrastructure, much of which is already stretched. Indeed, I seek to object to the proposals in the Consultation Document on these two important grounds - the proposed developments eat into protected green belt and would produce unsustainable strains on the current infrastructure.</p> <p>BRAG response to Question 46 (full document is attached)</p> <p>Question 46 <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 and 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>

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/2017/04/12/DBC-Guide-to-Review-of-ES-Maps-of-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 form 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

	<ul style="list-style-type: none"> 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO20879
Full Name	Mrs. Sue Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my

	<p>comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <p>Chiltern Conservation Group response below</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>
Include files	
Number	Question 46
ID	LPIO20891
Full Name	Mrs. Sue 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>I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <p>Chiltern Conservation Group response below</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</p>

	be considered equally weighted if such development requires release of Green Belt.
Include files	
Number	Question 46
ID	LPIO20893
Full Name	Mrs. Sue 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>I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <p>Chiltern Conservation Group response below</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	LPIO20896
Full Name	Mrs. Sue Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues & Options Local Plan to 2036 and request that my

	<p>comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <ol style="list-style-type: none"> 1 Whilst developers may offer infrastructure which could support proposed developments, I do not accept as credible that these would (a) outweigh the loss of Green Belt which fulfils National Planning Policy Framework (NPPF) criteria nor (b) be adequate for both new and existing populations. 1 I refer DBC to the statutory obligations set out in the Countryside & Rights of Way Act 2000 section 85 regarding protection of AONBs. 1 Further, I refer DBC to the paper '<i>Developments affecting the setting of the Chilterns Area of Outstanding Natural Beauty</i>' (ref. CCB website) written by the Chilterns Conservation Board (CCB), statutory authority for the protection of the Chilterns AONB. 1 Disappointingly, I find that the proposals of the Local Plan fail to uphold the obligations and sentiments of the CCB paper. The small market towns of Tring and Berkhamsted are surrounded by the AONB which informs their character and setting. The swathes of Green Belt which surround these towns provides a soft edge between urban settlement and countryside; thus destruction of such Green Belt makes hugely negative impact upon the AONB, particularly on the Eastern boundary of Tring. 1 12. I find that development of sites Tr-H1, Tr-H2, Tr-H3 and Tr-H4 would all be significant in their impact on the AONB, so do not accept the Local Plan assessment of these.
Include files	
Number	Question 46
ID	LPIO20897
Full Name	Mrs. Sue Yeomans
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I welcome the opportunity to contribute to the Dacorum Borough Council's (DBC) consultation on Issues &

	<p>Options Local Plan to 2036 and request that my comments below are fully taken into account in further deliberations on the Local Plan.</p> <p>Whilst I have given detail on some issues below, I totally support the response made by the Chiltern Countryside Group (CCG), which gives further comment on these key matters. Please refer to the CCG submission for my full response.</p> <ol style="list-style-type: none"> 1 3. I believe growth should be primarily focused upon Hemel Hempstead, as the main town of the Borough, as it has greater existing and potential capacity to support such growth and requisite infrastructure. 1 I would welcome creation of Suitable Alternative Natural Greenspaces 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. 1 Focus of development upon Hemel Hempstead would minimise impact upon the setting of the Chilterns Area Of Outstanding Natural Beauty (AONB).
Include files	
Number	Question 46
ID	LPIO20943
Full Name	Mr Jake Storey
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 been a company director for a number of years for a number of companies and have been part of creating strategies plans and implementing them.</p> <p>I have read your plan and as well as BRAG's response. And I am of the opinion that your proposals for enlarging Berkhamsted are ill considered and not sustainable - namely that if it was implemented it would destroy the character of the town and creating huge travel problems.</p> <p>All this despite Berkhamsted growing more than the current plan whilst Hemel and Tring have not.</p> <p>As representatives of the residents of Dacorum and living in a representative democracy I expect you to make a full reply to all the points raised by BRAG and not ignore them.</p>

BRAG response to Question 46 (full document is attached)

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

~~(http://www.stalbans.gov.uk/2012/04/24/DBC-Advises-Review-of-Green-Belt-Review/)~~
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 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 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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	<p>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>
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO20945
Full Name	Paul Armstrong
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 Budget was expected to release Green Belt Land but that wasn't the case. So surely the options to use the Green Belt Land will need to be parked? Whilst I accept more housing is needed, I don't feel we in Tring / Dacorum should step beyond others.</p> <p>I live in Tring and am particularly concerned about the effect of the developments just over the Bucks border. I appreciate you have numbers to make but you can't ignore what happens near your borders I hear you have issues in Hemel with the St Albans border and I believe there are issues with Bucks. RAF Halton is closing and I hear talk of 5,00 houses there. Then there is all the developments in Aylesbury, Aston Clinton and Weston Turville. These people will use Tring Station and most particularly the A41. It will also swap the housing need in the idea, developments in Tring will be affected. This is in addition to plans for Northchurch and Berkhamsted.</p> <p>I am also concerned about the Infrastructure coping with your plans –</p> <p>Schools – You indicate that Tring School is near capacity. Clearly it is. A new secondary school in the area (how about Northchurch, for that area and Tring) is a must for ANY further development surely. The continuing infil we have been witnessing is filling Tring school.</p> <p>The A41 – I know this is Central Government control but it is getting near capacity in the rush hours and the junctions are a massive safety concern. The developments in Bucks will kill this road, let alone your plans.</p> <p>Local roads – Things will need to be done with Station Road and Cow Lane.</p> <p>Tring Station – The car park currently fills by 10.00 on weekdays. We have to use Berkhamsted and that is</p>

	close to capacity. Expansion of the car parks is essential. Also the road in front of Tring Station needs attention, is too narrow for the traffic.
Include files	
Number	Question 46
ID	LPIO20947
Full Name	P Sutcliffe
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 wish to make objection to the proposed Local Plan in respect of four local proposals</p> <p>They are all on Green Belt</p> <p>The strategy seems to be lead by Landowners wishing to profit rather than actual planning thinking</p> <p>Page 150 of your document clearly shows the effect of this plan which will coalesce Hemel into Kings Langley and no doubt the next plan will join this conurbation into Watford</p> <p>Kings Langley is still a village . The proposals for 3400 extra houses ,ie 8300 people will virtually double the size and fundamentally destroy its chief attribute. . Section 4.2 wants to 'Enhance the character of the village'.</p> <p>Already Kings Langley is not coping with its present problems ,without adding to them. Traffic in the High Street and Vicarage Lane grid lock twice a day</p> <p>Parking on the Langley Hill Car Park is full by 9.00am</p> <p>The Nap Car Park essential for the Surgery is also at capacity if there is an event on at the Community centre</p> <p>The Station Car Park is often full by10.00am</p> <p>The Hospital situation would be a joke if it wasn't so serious . Do not have a baby or a heart attack at rush hour or especially on a match day</p> <p>The footpath network will be seriously eroded despite the need to encourage this healthy activity</p>
Include files	
Number	Question 46
ID	LPIO20948
Full Name	P Sutcliffe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>HH-hs Shendish London Road This is the one joining Hemel to kings Langley . The access onto the main road is a problem . It could destroy Footpaths 17,18&19 Which are strategic links between Kings Langley,Chipperfield and Apsley</p> <p>These proposals need to be rethought if we are not to end up with a Megacity of Greater Watford</p>
Include files	
Number	Question 46
ID	LPIO20949
Full Name	P Sutcliffe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>KL-h2Rectory Farm probably the least sensitive but still destroys the buffer between the two communities</p> <p>These proposals need to be rethought if we are not to end up with a Megacity of Greater Watford</p>
Include files	
Number	Question 46
ID	LPIO20950
Full Name	P Sutcliffe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>KL--h1 Hillside Farm the proposed Density is 60/Hectare ie about 5x the density of surrounding property. By the time the proposed park ,allotments ,footpath and cycle tracks are incorporated it would seem the only answer is multi storey development. There is a an inadequate access onto Love Lane which twice a day is at a standstill with school traffic. Your Planning Expert TRL has little credibility if he considers a 50 metre drop to be level access to the village.</p> <p>These proposals need to be rethought if we are not to end up with a Megacity of Greater Watford</p>
Include files	
Number	Question 46

ID	LPIO20951
Full Name	P Sutcliffe
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>KI-h3 Wayside Farm This proposal really would destroy the character of the village and remove that buffer of pleasant green space between Kings Langley and the M25. It would seriously change footpaths Kings Langley 5,7&8 which give countryside access not only to the villagers but are vital connection into the Chiltern AONB for walkers arriving at Kings Langley Station from London. Furthermore FP8 is the County Long distance footpath the Hertfordshire Way. The prospect of these paths being constrained between 2 metre high panel fence on a 1 metre wide alley way in a housing estate does not appeal Again TRL do not understand contours . There is a 45metre fall on this site. No solution is put forward for the historic Hunting Lodge on this site. Their trite comment that it would encourage walking is just underlines their lack of professionalism . The walks are already there. this proposal can only deteriorate them</p> <p>These proposals need to be rethought if we are not to end up with a Megacity of Greater Watford</p>
Include files	
Number	Question 46
ID	LPIO20952
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published.We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group(BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.</p>

We would ,however,like to make the following general observations and also emphasise and amplify some of the points that BRAG has made in answer to individual questions.

General Points.

- 1 The fine words in the Foreword, especially with regard to protecting the character of local towns, villages and countryside are simply not reflected in the options proposed. Similarly, the principles expressed in respecting the character of the existing settlement pattern, protecting the character and value of important landscapes, heritage and biodiversity, and ensuring new development can be supported by the necessary infrastructure are just not adhered to in your proposals. What of the mission statement at 10.2.3-Protecting the character of our towns and villages and that of important landscapes will be important considerations? What of minimising damage to the Green Belt, protecting the environment and ensuring the infrastructure is in place(10.1.2)?

2.Many of the principles of the Core Strategy, the Inspector's responses to the Core Strategy and announced Government and Departmental policies have been studiously ignored in the presented options.

- 1 Furthermore the apple-pie vision you have for the Borough is clearly impractical and in respect of infrastructure, particularly healthcare and the environment, has already been severely compromised by recent decisions.

4.The problems we are facing(a very limited amount of land, constrained by hitherto protected environments, unsuitable topography and inadequate infrastructure) are not easy to solve;however those constraints are recognised in Government policy(most recently in the Budget speech)and we need a plan which acknowledges those constraints and has enough imagination and demonstrable goodwill to mitigate them without either traducing official policy or ruining our environment for generations to come. The options put forward signally fail to achieve that and in many places contradict DBC's own stated aims and present policies.

5.The options are far too rigid ;the "shoe-horned" options we are being offered, driven by a very simplistic, tick-box exercise by so-called consultants ,are symptomatic of a top-down approach which does not examine all potential sites available across the Borough and assess them on their own merits irrespective of where they happen to be and whether they have been put forward by developers .For example Tring and Bovingdon are less topologically constrained than Berkhamsted but this, amongst many other defining factors, is not represented in the options offered.

How on earth can development in the Green Belt offer net environmental enhancements? The net effect can only be negative.

There are many more than seven options(and one of the 7 [1C] is plainly iniquitous and contrary to DBC's own policy statements and the Core Strategy Inspector's

findings) ;the process should be driven by a more bottom-up approach. The whole exercise in its narrow sterility looks like a blatant attempt to subvert the democratic process and impose DBC's own solutions and those of developers who have put forward sites ,many of which are contrary to both the spirit and the letter of the previously agreed Core Strategy.

- 1 It is government policy that the public sector should make a significant contribution to housing needs yet only one of the 25 proposals is on publicly owned land.

- 1 The cumulative impact of development is completely ignored throughout the issues and options. There is no record of developments recently completed or for which planning permission has already been granted so that the cumulative effects on infrastructure can be properly assessed and the options then evaluated. This aspect is also conspicuously absent from the consultant's report.

8.The process appears to have ignored important statements in the Inspectors' reports on the Core Strategy and the south Berkhamsted scheme,DCLG pronouncements and needs to take account of the recent Budget speech as a statement of official policy notably "continuing strong protection for the Green Belt" and the funding and delivery of infrastructure" to facilitate higher density development".

Substantial downward revisions to business investment and GDP growth and an admission that "far too much of our economic strength is concentrated in our capital city" are also Budget statements that DBC should be employing to mitigate the adverse impact of any Plan on the existing residents of Dacorum.

9.Throughout the document there appears to be a presumption that development will somehow improve the infrastructure. There is already an infrastructure deficit and past experience clearly informs us that infrastructure improvements never ever keep pace with the cumulative consequences of development.

10.The process is not robust enough in delivering the infrastructure improvements which are required if any of the options are to be adopted. There appears to be no means of ensuring that the specious promises of those promoting developments are actually delivered. Admittedly most areas of infrastructure provision lie outside DBC's direct control but planning permission should not be granted without the most stringent of guarantees from the providers. Indeed many of the site proposals are still totally vague in respect of infrastructure promises, let alone delivery. The present infrastructure is in many areas(water,roads,parking, doctors, hospital access and parking, mental and old age care) struggling hard to cope with developments which have already taken place, not to mention what has subsequently been granted planning permission.

- 1 For a plan purporting to value and protect the environment there is a glaring and inexplicable absence of the role tree-planting can play in absorbing emissions, reducing light and noise

	<p>pollution and mitigating floods .Recent FOI responses we have received from DBC demonstrate a pitiful record of tree-planting in Berkhamsted over the past 5 years;43 trees cut down on council-owned land; a mere 22 new ones planted of which we have only been able to detect 7 healthy and in situ. Moreover the procrastination over the replacement of 4 trees felled by DBC in Berkhamsted High Street appears to demonstrate a clear lack of intent and budgetary provision on DBC's part. Why is DBC in apparent denial regarding the consequences of increasing emissions and global warming? Tree planting is a relatively low cost option in the fight against the pollutant effects of excessive development. It will not be long before Berkhamsted High Street and ,no doubt, other parts of the Borough suffer from inadequate and illegal air quality.</p> <p>We are not sufficiently familiar with the sites outside Berkhamsted to offer any informed opinions though,at first sight,some of the proposals,particularly for Tring and Bovingdon, look topologically less constrained.If DBC shares this view it merely demonstrates the failings of an inflexible arithmetic approach to framing the options for consideration.</p> <p>In summary, the whole consultation has all the appearance of a top-down, binary,tick-box exercise which has increasingly little regard for the content of the Core Strategy,the Inspectors' reports and statements of Government policy and takes no account of the specific topography within the Borough or the respective contributions to developments already made by some of its parts.</p>
Include files	
Number	Question 46
ID	LPIO20998
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published.We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group(BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our</p>

endorsement of Berkhamsted Town Council's submission.

Q46. BRAG-a compelling overview to which we fully subscribe.

Sites. As per BRAG

BRAG response to Question 46 (full document is attached)

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

~~(http://www.berkhamsted.gov.uk/DBC/DBC%20Review%20Final%20Report%20-%202014-15.pdf)~~
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 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 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

	<ul style="list-style-type: none"> 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	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO21000
Full Name	Mr & Mrs J.D Battye
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This is our response to the consultation exercise in respect of the issues and options for the Local Plan recently published. We wish that the following views and comments be taken into account in your consideration of public responses.</p> <p>The Berkhamsted Residents' Action Group (BRAG) are responding in full to the Issues and Options consultation. We hereby request that you accept this e-mail asking you to duplicate BRAG's responses under our names so that a complete repetition of BRAG's submission is avoided. We would also like to place on record our endorsement of Berkhamsted Town Council's submission.</p> <p>Q.46 Sites Yes Be-h2 Haslam Fields</p> <p>Additional comment on Be-h2 Haslam Fields.</p> <p>This looks to be a particularly ill-conceived proposal. In addition to placing even more strain on Shootersway which at times is already struggling to cope with traffic flows, the site will impinge on Denny's Lane and Cross Oak Road which either do not have footpaths or only in part, are narrow in places and have already become rat-runs as a result of traffic generated by the cumulative effect of recent developments. The proposed notion of a wild-life, walking and ecological area is a mere device to gain environmental credibility. This part of the site is being knowingly held in reserve as a future money</p>

making opportunity for the landowners. If there were a genuine desire to provide nature facilities for the community there is little reason why it could not have been promoted as such in the past. Hockeridge and Pancake Woods just beyond already offer walking and a public space with plenty of wildlife and biodiversity. The only way that the proposal would be acceptable is by retaining the playing fields as they are for school and community use (and not shifting them to a new Green Belt site, unspecified in any detail in the proposal) building houses on the southern end of the site with suitable tree and/ or other screening from the A41 and offering access eastwards parallel to the A41 to avoid further overloading the Shootersway/King's Road junction.

Berkhamsted Town Council response

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

Be-h1; Land south of Berkhamsted

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

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

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

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

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

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.

	<p>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.”</p> <p>The density is too high for the neighbouring Character Area.</p> <p>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.</p> <p>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.</p> <p>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</p>
Include files	BTC (final) Issues and Options Response 121217.pdf
Number	Question 46
ID	LPIO21001
Full Name	Paul Harris
Company / Organisation	Great Gaddesden Parish Council
Position	Chair
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Parish of Great Gaddesden has a population of around 1,000 people with 93% of the Parish lying in The Chilterns Area of Outstanding Natural Beauty. The Dacorum Local Plan with its proposals, described as Hemel Hempstead North is a major threat to the quality of life of people in the Parish.</p> <p>These housing proposals with a projection of 4,500 houses by 2036, could lead to a population in the Parish by 2036, of 15 to 18,000 people. This is completely unacceptable. It would lead to a loss of rural land, increase air & noise pollution, traffic congestion would be a nightmare & according to the</p> <p>Environmental Agency Dacorum does not have enough sustainable water resources for such a massive house building programme . These plans would remove the rights & tranquillity that horse riders & walkers have enjoyed for generations. The plans also encroach on The Chilterns Area of Outstanding</p>

	<p>Natural Beauty, which in law has the same status as a National Park.</p> <p>Looking at the Dacorum Local Plan who are the houses for? There are 5,609 households on the Council Waiting List. Surely these people should have priority. The Dacorum Core Strategy proposed 11,200 homes to be built by 2031. The households on the Council Waiting List could provide half of that</p> <p>number. The Core Strategy is sustainable, but the new Local Plan is not. The Borough Council should stand up the Government & tell them that Dacorum has done enough & will go no further.</p>
Include files	
Number	Question 46
ID	LPIO21002
Full Name	Paul Harris
Company / Organisation	Great Gaddesden Parish Council
Position	Chair
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Parish of Great Gaddesden has a population of around 1,000 people with 93% of the Parish lying in The Chilterns Area of Outstanding Natural Beauty. The Dacorum Local Plan with its proposals, described as Hemel Hempstead North is a major threat to the quality of life of people in the Parish.</p> <p>These housing proposals with a projection of 4,500 houses by 2036, could lead to a population in the Parish by 2036, of 15 to 18,000 people. This is completely unacceptable. It would lead to a loss of rural land, increase air & noise pollution, traffic congestion would be a nightmare & according to the</p> <p>Environmental Agency Dacorum does not have enough sustainable water resources for such a massive house building programme . These plans would remove the rights & tranquillity that horse riders & walkers have enjoyed for generations. The plans also encroach on The Chilterns Area of Outstanding</p> <p>Natural Beauty, which in law has the same status as a National Park.</p> <p>Looking at the Dacorum Local Plan who are the houses for? There are 5,609 households on the Council Waiting List. Surely these people should have priority. The Dacorum Core Strategy proposed 11,200 homes to be built by 2031. The households on the Council Waiting List could provide half of that</p> <p>number. The Core Strategy is sustainable, but the new Local Plan is not. The Borough Council should stand up the Government & tell them that Dacorum has done enough & will go no further</p>
Include files	

Number	Question 46
ID	LPIO21003
Full Name	Penny McPherson
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 reject to the consultation affecting Kings Langley house building programme.</p> <p>I do not believe the green belt in and around the parish should be developed or be considered in the Dacorum local plan.</p> <p>I recently moved to Kings Langley from a city. I chose the location because rural setting, living by a farm, village culture and beautiful landscape. I have two small children and wanted them to have better quality of life.</p> <p>The plan to build in Kings Langley on green belt land is totally inappropriate and does not take into consideration the already congested traffic and limited infrastructure. It takes 20/30 mins to get out of the village currently as it is a through road for Apsley, Bovingdon, Chipperfield, Hemel and other towns. I live on the Hempstead Road and this is exceptionally busy in a morning and afternoon. More traffic will equate to more accidents. There is already high pollution and this will as long have a big impact. The beautiful landscape will be destroyed. There is limited infrastructure already so how can it accommodate more people. The local school is over subscribed. The GP service is so busy it's hard to get an appointment. The train station is very small and the car park holds less than 50 cars. On occasion I have had to go to the next town to get a train as the car park is full. The farm is a very important part of the village servicing a lot of the local residents. How can we consider destroying this to build new houses.</p> <p>I wholeheartedly disagree with local plans for Kings Langley. I suggest consider other brown belt areas that are more suitable or building in existing towns and cities that can accommodate additional residents.</p>
Include files	
Number	Question 46
ID	LPIO21004
Full Name	Penny McPherson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here	The farm is a very important part of the village servicing a lot of the local residents. How can we consider destroying this to build new houses.
Include files	
Number	Question 46
ID	LPIO21006
Full Name	Dawn Bryant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>How can proposals be suggested before infrastructure has been investigated thoroughly, it is ridiculous? Kings Langley's infrastructure is already strained. It states that Developers <u>contribute</u> to the new infrastructure, where are Dacorum Council getting the money from to cover the balance?</p> <p>Green Belt is protected to stop urban sprawl. Stop and look at what you are doing. The only people to benefit are the greedy Developers who have NO interest in the future of our village.</p> <p>When the A41 bypass (completed 1993) was given the go ahead the volume of traffic through Kings Langley High Street was nothing compared to today's nightmare. Yet the current proposals' are for far greater housing development than already seen. The roads in Kings Langley cannot be increased further. The majority of the roads are single file due to parked vehicles. I am already witnessing an increase in road rage. What is happening to our village?</p> <p>The length of time it takes to travel to the M25 in rush hour is ridiculous</p> <p>More housing means more children, the school run traffic will increase as children will have to attend schools further afield.</p> <p>With an average of 2 cars per household these proposals mean thousands of additional cars in Kings Langley.</p> <p>With the current volume of cars on the road people do not feel safe cycling.</p> <p>We already have issues with the lack of parking at the Ovaltine. What are the parking plans for the Link Road development? (Three Rivers DC)</p> <p>Dacorum's current housing developments do not include enough parking either, look at Red Lion Lane.</p> <p>We have a Fire Station in Kings Langley; look at the parking at the bottom of Common Lane.</p> <p>There's standing room only on rush hour trains travelling from Kings Langley, the car park is always full, commuter's park all day outside residence homes.</p> <p>Our bus service is hopeless</p>

I attended a Dacorum Council meeting in November one of the points raised;

“There are 10,000 people on the Dacorum Housing Register yet only 2,000 are actively looking for properties, we were asked how Dacorum should go about investigating the 8,000 to get an accurate figure?”

If Dacorum Council do not even have accurate housing waiting list numbers. Where do the required annual housing figures come from?

Why has HH h3 - Shendish been included in the Hemel Hempstead figures when Shendish is located in Kings Langley? The figures of the proposed Shendish development should be included in the Kings Langley numbers. Has this been done deliberately to make the Kings Langley figures look less compared to the other areas?

I strongly feel that Kings Langley cannot even sustain the figure of 602

What proof is there that affordable housing will be available for people that have grown up in the village and who's families have lived here for generations? I cannot imagine for one minute that affordable housing will be built at Shendish next to a golf course.

My garden has flooded for 4 years now, from April to July of this year Dacorum Council finally addressed the issue. If we build on our Green Belt Land, flooding will be a regular occurrence in Kings Langley.

Where is the WATER coming from to supply these planned developments. In the summer months we only have to have a heat wave and we get a hose pipe ban!

I have personal experience of both my parents having long stays in Watford hospital and having to cope with the traffic situation from Kings Langley to Watford. I had to raise complaints regarding their care in 2007 and again in 2016, in my experience Watford hospital's care and services had not improved in those 9 years; in fact I would go as far to say, they had got worse. The decision to close the Urgent Care Centre at Hemel Hempstead hospital was appalling. We require a decent hospital right now to deal with our current population but still nothing is being done.

These proposals will affect the trade to our High Street Shops; parking is already a problem and the traffic situation will deteriorate the High Street will be permanently grid locked. People will not want to queue through the village and then wait for a parking spot they will just head straight to Supermarkets.

My father's family are from Bovingdon and my mother's from Kings Langley both going back generations. In my lifetime (53yrs) I have already seen how housing developments listed below together with the M25 (Oct 1986) and A41 Bypass (Aug 1993) have already changed Kings Langley dramatically;

Abbott Printers

Abbott Number 2 Engineering

The Ovaltine

Kings Langley Engineering

	<p>Tooveys Mill</p> <p>The 3 local John Dickinson's Sites located at Nash Mills, Apsley and Home Park</p> <p>John Dickinson's Football Pitch (now Roman Gardens)</p> <p>Having the A41 Bypass was supposed to protect Kings Langley from the traffic and keep it as a village.</p> <p>Therefore it is without doubt that building on our Green Belt will change Kings Langley forever - <u>it will no longer be a village!</u></p> <p>We should be holding on to our heritage and the green belt not destroying it. Wayside Farm (one of only 2 remaining dairy farms in Hertfordshire) should remain, Charlie has worked so hard to turn things around, and farming should be supported. Rectory Farm a stone's throw from the village high street should remain a site of natural beauty and expand on the community food initiative. They both add to the village ethos. What memories will our children have of growing up in Kings Langley it certainly won't be open spaces and the outdoor life as it will not exist.</p> <p>I chose to remain in Kings Langley because I want to live in a village, if I wanted to live in a sprawling built up area I would have purchased a property in a town.</p> <p>I am very sad that Kings Langley will lose its identity as a village and just be part of Hemel Hempstead and eventually Watford - As once development starts it doesn't stop!!</p>
Include files	
Number	Question 46
ID	LPIO21007
Full Name	Dawn Bryant
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Why has <u>HH h3 - Shendish</u> been included in the Hemel Hempstead figures when Shendish is located in Kings Langley? The figures of the proposed Shendish development should be included in the Kings Langley numbers. Has this been done deliberately to make the Kings Langley figures look less compared to the other areas?</p> <p>What proof is there that affordable housing will be available for people that have grown up in the village and who's families have lived here for generations? I cannot imagine for one minute that affordable housing will be built at Shendish next to a golf course.</p>
Include files	
Number	Question 46
ID	LPIO21008

Full Name	Dawn Bryant
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 should be holding on to our heritage and the green belt not destroying it. Wayside Farm (one of only 2 remaining dairy farms in Hertfordshire) should remain, Charlie has worked so hard to turn things around, and farming should be supported.</p> <p>They both add to the village ethos. What memories will our children have of growing up in Kings Langley it certainly won't be open spaces and the outdoor life as it will not exist.</p>
Include files	
Number	Question 46
ID	LPIO21009
Full Name	Dawn Bryant
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 should be holding on to our heritage and the green belt not destroying it.</p> <p>Rectory Farm a stone's throw from the village high street should remain a site of natural beauty and expand on the community food initiative. They both add to the village ethos. What memories will our children have of growing up in Kings Langley it certainly won't be open spaces and the outdoor life as it will not exist.</p>
Include files	
Number	Question 46
ID	LPIO21010
Full Name	Peter and Lindsey Russell
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 have lived at Kings Langley since 1980 and brought up two children, both of who attended the local schools and now have their own house/flat in the area.</p> <p>The village has already expanded using infill and brownfield sites, to which I have no objection. However despite having the bypass built, traffic along the A4521 has now already returned to near saturation point at peak times. Traffic already queues from the village to the M25 roundabout from 06.30 with up to 10 minutes added to my morning commute in the past 10 years. Similarly with narrowing of the High Street due to parked cars there are often long queues whilst vehicles, especially lorries and buses, have to wait until they can continue in single file.</p> <p>If hundreds or even thousands of extra vehicles are added to this, I just do not see how the local roads and High St will cope, especially when widening is just not an option. Similarly where will cars park when visiting the village? High St spaces and car parks are already at capacity, with no option to extend, without using up green space. Pollution levels will also obviously increase.</p> <p>Turning to local, schools, doctors and infrastructure. Will they also have room to expand and can Langley Hill, Vicarage Lane and Common Lane cope with all the extra traffic?</p> <p>Currently the village is definitely a village, surrounded by farms and green space. If much of this is lost we will just become urban sprawl and lose our unique identity.</p> <p>I appreciate that people have to live somewhere, but please continue to use brownfield sites and do not destroy the green spaces that have made our village so special since the time of Henry VIII.</p>
Include files	
Number	Question 46
ID	LPIO21011
Full Name	Mrs Anne Shadbolt
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 lived in Kings Langley for nearly 30 years and I am totally opposed to any development on Green Belt land.</p> <p>The national planning policy framework states that the green belt should:</p> <ul style="list-style-type: none"> - check restricted sprawl of large built up areas (Kings Langley is a village and should not merge with Hemel/Apsley) - prevent neighbouring towns merging into one another (the proposed developments would mean that Kings

	<p>Langley would merge with Watford in one direction and Hemel Hempstead in the other)</p> <ul style="list-style-type: none"> - assist in safeguarding countryside from encroachment (the 3 farms listed for potential development clearly constitute encroachment of the countryside) - preserve setting and special character of historic towns (Kings Langley is a special village with medieval history which would be lost if it becomes amalgamated with Hemel and Watford) <p>The proposed scale of development is clearly unsustainable in Kings Langley as everyone needs a car. The roads currently become gridlocked from early to mid-morning. On a recent trip to Watford Hospital it took me one and a half hours to drive in and take my husband to an appointment.</p> <p>Building on the green belt would seriously impact on wildlife. Destroying the natural habit of both Muntjac and Red deer, smaller wild animals and a whole range of birds.</p> <p>If this development went ahead it would create urban sprawl and destroy the character of the village.</p> <p>The only development that should be allowed is on brownfield sites only. No development should be allowed on the green belt.</p>
Include files	
Number	Question 46
ID	LPIO21012
Full Name	Michael Rogers
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'm writing to raise concerns regarding the proposed building development in Bovingdon.</p> <p>I've lived in Bovingdon for my whole life (35 years) and I have concerns that the proposed development will cause a massive strain on the infrastructure of the village.</p> <p>The roads around the village are already overcrowded, narrow and are not up to increased numbers of residents. In particular the village high street is very crowded and in accessible at busy points of the day. My wife is disabled and uses an electric wheelchair and she struggles to get around safely as cars are parked all over kerbs and pavements.</p> <p>Other facilities would also be put under strain if these developments went ahead. These include medical services, schools and drainage which are already under significant pressure.</p>
Include files	

Number	Question 46
ID	LPIO21014
Full Name	Mr Christopher Day
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 appalled at the prospect of Bovingdon being asked to absorb yet more housing development. I attended the public meeting in the Bovingdon Memorial Hall on 5th December and took on board virtually all of the comments made by members of the public who attended. The hall was packed – with many people having to stand at the back and down the sides of the main hall. There was an unopposed consensus that we can't take any more. I have attended many such meetings in the 34 years that I have lived here yet I have never come across such a unified response to any planning issue.</p> <p>The village is already struggling to function, with daily gridlocks of traffic in the High Street caused by the combination of parked vehicles, delivery lorries and traffic volume. How long before we have a serious accident as a result of this latter issue?</p> <p>We were told at the meeting that the B4505 from London Road in Boxmoor to Chesham is the busiest A road in Hertfordshire. This compounds some information that I was given by a Senior member of Herts Police about 10 years ago who told me that at that time this road was a B road carrying A road volumes of traffic. There are no obvious significant employment opportunities in Bovingdon, so any occupiers of the new homes will have to travel out of the village to work – thus increasing these traffic volumes.</p> <p>In addition, whilst any new homes are being built – presumably over a period of several years – there will be an increase in construction related vehicles coming into the village.</p> <p>We are all aware that Hertfordshire is not the only county being asked to accommodate additional housing. As you know, we are very close to the border with Buckinghamshire, and any developments agreed for the Chesham area will also result in additional traffic on the B4505.</p> <p>Some may propose an upgrade of this road but I don't see how this can be achieved, even if there was a will to do so – which I doubt. I have many years of road building experience and I can see several reasons why this would be very difficult and very expensive. Any such improvement would require a major reconstruction of the junction with the A4251 at The Swan traffic lights, or the traffic would just gridlock back up the hill from this junction even more often than it already does. Again this would be very difficult to achieve due to the proximity of the rail and road bridges adjacent to the station. The</p>

only real benefit would come from creating a new slip road directly to the A41. However, this would mean 3 such junctions on the A41 within a very short length of road – which would be far from ideal, and this one would be on Boxmoor Trust land.

We have previously been told that The Tesco development will not detract from the volume of trade experienced by the existing shops in the high street. Therefore, if the Tesco business is to thrive then by definition their trade will have to come from outside the village, which can only mean more traffic. In addition, if this shop does thrive then it will need a regular supply chain which again will have to come from outside the village = yet more traffic.

Without any improvements to this road it is difficult to see how it is going to cope with these resulting additional volumes of traffic.

I understand that the development of Bourne End Lane including an extension across the airfield to effectively create a Bovingdon By-pass is a possible option, but it is not currently being considered by the County. This could be a workable solution to some extent.

We have recently experienced floods in Bovingdon – for the first time in 50 years. This is surely a warning of things to come. Any further reduction in naturally draining fields combined with an increase in buildings and hard landscaping associated with housing developments will only exacerbate this threat.

Two of the proposed development sites are far enough from the village high street that some of the new residents will drive their cars to get to the shops and/or the school. As is well documented; the high street is already a big problem with regards to parking, and the ability to drive through in either direction. As with the B4505, it is very difficult to see how any changes will result in any significant improvements to this situation. A Parish Council lead working party has been considering changes for at least 6 months, and despite their best efforts, so far they have come up with nothing tangible. One option being considered, that has since been abandoned as it was deemed to be impractical, would have generated 5 additional parking spaces. With all due respect to this team; this is a drop in the ocean, but it does demonstrate how difficult it will be to bring about any worthwhile changes.

The proposal for 450 new houses will generate approximately 600 additional cars, 100 primary school children, and 100 secondary school pupils. These children will all require schools. I was a Governor of Bovingdon school about 10 years ago and at the time we were told that it was the biggest Primary School in Hertfordshire. Even if we could cram more buildings on to the already cramped site – would we want to? Is a 400+ pupil school a good model for the Primary level?

The creation of a new school complex will result in less fields replaced by more buildings and hard landscaping which will further increase the flooding risk.

Similarly, are their places for the secondary age pupils in the existing schools within reasonable travelling

distance? I suspect not. Has the Dfe been consulted about providing funding for new schools? I doubt that as well.

The 600 cars will not sit on their drives all day. They will all need to be absorbed by the existing road network, either the overused B4505, or the inappropriate country lanes heading out through Chipperfield and beyond.

Ironically, if these additional houses are all built then all of the residents of the village post this event will not be able to attend any future public meetings to discuss future developments, as the village hall is not even big enough for the existing population!

I understand that the proposal is based on the national defined need for additional housing. I would ask if this defined need was calculated by the same “experts” who predicted a financial disaster for the country immediately following a Brexit vote? I am deeply suspicious of these figures. Even if they are correct I object to the strategy to meet the need by spreading out the new housing developments across areas of the country where there is never likely to be any employment opportunities to soak up the additional people. This strategy will either lead to an increase in unemployment, and the resulting detrimental impact on society, or an increase in the use of cars – which in the South East is just going to add to all our problems, not least for the national pollution targets.

If there is such a definite need for additional housing in Bovington, why are there currently about 40 2 to 4 bedroom houses on the local Estate Agent’s books, and why have Tesco not proceeded to build the flats that they fought so hard to get Planning permission for many years ago?

As you are aware there are already approved plans for the provision of about 90 dwellings in the village. Over half of these are aimed at older people. This will put a disproportionate strain on the existing medical services, both in the village, and on Hemel, Watford and St Albans hospital services. How will this be addressed? And what provision is to be made for the other 360 dwellings?

Most of the current village residents were not born here; we chose to live here. We chose to live in this particular, and in many ways unique, environment. These proposals will go a long way towards seriously eroding this environment in many ways.

A summary of my comments is that the village is full. No significant increase in housing is possible without having a detrimental impact on the existing village infrastructure and environment, and ultimately the quality of life of the residents. My view is that we have accommodated enough increase in recent years; not least the prison and the adjacent housing, the ex Hadlands plot, and the various infill projects, and now we have 90 dwellings more in the plans. We have done enough

Include files	
Number	Question 46
ID	LP1021016

Full Name	Mrs Sylvia Ewington
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 write regarding the various proposals for the increase in the number of houses to be built in Bovington. an the consequential increase in the population that would result from this.</p> <p>Village services such as the Academy, the GPs and the dentists are already at full capacity and there seem no prospects for building to facilitate more children in particular.</p> <p>To add 450 more houses would be likely to result in an increase in the number of cars by up to 900. and as there is very little business in the village traffic flow for people travelling to and from their place of work would become overwhelming and congestion would magnify. We already have a difficult situation at the start and end of the school day and when this is combined with deliveries to local shops and the movement of heavy goods vehicles just passing through,the high street is at a standstill. The situation is currently intolerable and is made worse due to the complete absence of car parks.</p> <p>Due to the Saturday market the traffic situation through the village extends through to an extra day, with additional consequences for its residents and those of Felden. This market provides no benefit to this village and the time has surely come to consider its closure.</p> <p>Notwithstanding the proposed increase in housing there is already a need for a road to by pass the village passing across the old airfield. Much relief would result from this, providing also improved access to the Mount Prison.</p>
Include files	
Number	Question 46
ID	LPIO21018
Full Name	Caroline Cowley
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 against too many new houses in Berkhamsted on green belt land because of the congestion already in the town. Cars are parked down both sides of side streets now, where will the new occupants park to go to the</p>

	station, or to their work. The doctors are v busy with waits of weeks for an appointment. The schools are full. This was a beautiful market town but it is becoming part of London. We need the break that the green belt was intended to give so we keep the character. I lived in the town for 33 years but moved 2 miles away 5 years ago to get away from the crowding.
Include files	
Number	Question 46
ID	LPIO21019
Full Name	Karen Berry
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 of my extreme sadness and concerns to the proposed plans for new housing to be built in the village where I live Kings Langley.</p> <p>I understand with this ever-changing world new homes to have to be built to house an ever-growing population, but with somewhere as beautiful and pretty as Kings Langley it seems criminal to ruin it and make it into a town. (which is what it would effectively become with this extensive building proposal)</p> <p>Surely there are other sites where these houses can be built that would not ruin greenbelt land that once it's gone will be gone for ever?</p> <p>I have friends who are amazed when they drive in to Kings Langley and still see a beautiful farm, with that gone it would lose the heart of the village.</p> <p>My main concerns are-</p> <p>-Since I have lived in Kings Langley for the last 22 years I have noticed a significant increase of traffic even though we have the A41 bypass. When the a 41 is blocked which is normally a weekly occurrence the whole village including Apsley is at a standstill.</p> <p>With a high percentage of new housing being built comes more cars which will have an extreme impact on our roads and traffic which our village would not be able to cope with</p> <p>-The train line out of Kings Langley is completely oversubscribed at present there are no available at peak times.</p> <p>-The strain this would have on doctors surgeries would be immense, Kings Langley surgery along with the other surgeries would not be able to cope with this.</p> <p>-Traffic builds up in Rucklers Lane most mornings and evenings as there is already a bottleneck at the traffic lights which has to cope with a four way system.</p> <p>-Kings Langley will become squashed and the strain on amenities Will suffer. We already have double the</p>

	<p>amount of cars then we had in the last 10 years resulting in cars being parked on pavements and in narrow roads blocking access to emergency vehicles. Many of these cars are parked for the day while people go to the college the schools the train station ...our Village could come not cope with any more parked cars.</p> <p>-I am also taking into consideration increased air-pollution and the loss of natural environment for many animals and birds that we have the pleasure to see on a daily basis in Kings Langley.</p> <p>-I believe the sites in Kings Langley are not suitable for the proposal and I object to all four.</p> <p>I would like you to take my thoughts into consideration when you are considering your options.</p>
Include files	
Number	Question 46
ID	LPIO21021
Full Name	Mrs Lynne Head
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I am currently wading through responses to the local plan. From the look of things, if the land at Shendish gets accepted for development, my property will be completely surrounded. I live on Apsley Manor Farm.
Include files	
Number	Question 46
ID	LPIO21022
Full Name	Mrs Lynne Head
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	You are asking for possible building sites. My property sits in one third of an acre and if this development gets the go-ahead, I'd like to offer up the paddock to the side and rear of my property for housing
Include files	
Number	Question 46
ID	LPIO21023
Full Name	Mrs Irene Beck

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 wish to object to the latest proposals as I feel that the infrastructure cannot cope at the moment ie: the surgery is oversubscribed and it's difficult to get an appointment. Also the school is oversubscribed and the roads cannot cope with the existing traffic and no improvements planned.</p> <p>I feel we would lose what little Green Belt we have. Once lost we cannot retrieve it.</p> <p>Also the proposed sites are in an area of outstanding beauty.</p> <p>Kings Langley would disappear as a village and become a suburb of Hemel Hempstead.</p> <p>There are brown sites suitable for development in Hemel near industry and therefore minimising the impact on pollution as there would be less travelling.</p> <p>I also think that very little of this housing would be for affordable housing, only benefiting the developers.</p>
Include files	
Number	Question 46
ID	LPIO21025
Full Name	Mrs Irene Beck
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 wish to object to the latest development proposals.</p> <ul style="list-style-type: none"> -I feel that the infrastructure cannot cope with the existing traffic in Bovingdon. -Box Lane on a Saturday is like the M25. -There is nowhere to park in the High str and the flow is restricted most of the time. -the surgery is oversubscribed and it's impossible to get an urgent appointment - the school is oversubscribed and cannot be expanded. - there are no plans to improve the infrastructure. - the High St cannot be improved and if it was possible, it would change the character of the village. -why hasn't Bovingdon airfield being considered? - Also The brownfield sites in the Hemel industrial area would be a better proposition as there is industry and

	<p>the pollution impact would be lessened as there would be less travelling.</p> <p>-As we speak 20 houses are being built in Bovingdon, of the High Str.</p> <p>- the new proposal would increase the village's total homes and cars by 25%.</p> <p>-these developments would have a direct impact on the Green Belt. Once taken, the Green Belt cannot be replaced.</p>
Include files	
Number	Question 46
ID	LPIO21028
Full Name	Matthew McMahon
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. 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>2. 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 and now we have a large McCarthy & 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>3. 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>4. Green belt should not be built on !</p> <p>5. Drainage and sewage needs to be improved to cope with the risk to flood areas.</p> <p>6. 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 goers or impassable when the weather is bad!!</p>

Include files	
Number	Question 46
ID	LPIO21036
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>I am fully aware of the pressures being placed on Dacorum to come up with a sustainable plan for increased housing. Having attended the event at Pendley Manor and discussed the plan with the representatives there it is obvious that a lot of work has gone into the project to have a plan in place rather than one imposed by government.</p> <p>The area of Grove Fields about which the attached document is referenced is in a part of the town that has heavy traffic already. Grove Road itself is having to be constantly repaired because of its poor substructure. Highways have said they cannot do anything about the poor condition due to the ancient basis of the road and it just has to be constantly repaired. It would not cope with an increase of traffic offered by the construction of an estate on its boundary.</p> <p>The cross roads at the end of Grove Road is hazardous at the current level of traffic, there are accidents there in the mornings as people rush to the station and there is no clarity of priority. This would increase dramatically if there was an outpouring of cars getting to the station from Grove Road.</p> <p>I am opposed to the proposed increase in size of Tring. It is a compact market town, full of real people who have trades and businesses locally. Such large growth would change the whole nature of the town and it would become another dormitory town, losing its identity. This I am sure is not of interest to planners but needs to be said</p> <p>Green belt land is there for the protection of the town boundaries. Grove fields is a natural boundary allowing Tring to nestle with clear space between it and the adjoining protected countryside.</p> <p>I think that alternative sites allowing easier access would better be considered or small areas dotted around the town plus brownfield sites need further investigation.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21083
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21085
Full Name	julie owen
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 attached report says what we friends of Grove Fields cannot say in the correct language.</p> <p>I am fully aware of the pressures being placed on Dacorum to come up with a sustainable plan for increased housing. Having attended the event at Pendley Manor and discussed the plan with the representatives there it is obvious that a lot of work has gone into the project to have a plan in place rather than one imposed by government.</p> <p>The area of Grove Fields about which the attached document is referenced is in a part of the town that has heavy traffic already. Grove Road itself is having to be constantly repaired because of its poor substructure. Highways have said they cannot do anything about the poor condition due to the ancient basis of the road and it just has to be constantly repaired. It would not cope with an increase of traffic offered by the construction of an estate on its boundary.</p> <p>The cross roads at the end of Grove Road is hazardous at the current level of traffic, there are accidents there in the mornings as people rush to the station and there is no clarity of priority. This would increase dramatically if there was an outpouring of cars getting to the station from Grove Road.</p> <p>I am opposed to the proposed increase in size of Tring. It is a compact market town, full of real people who have trades and businesses locally. Such large growth would change the whole nature of the town and it would become another dormitory town, losing its identity. This I am sure is not of interest to planners but needs to be said</p>

Green belt land is there for the protection of the town boundaries. Grove fields is a natural boundary allowing Tring to nestle with clear space between it and the adjoining protected countryside.

I think that alternative sites allowing easier access would better be considered or small areas dotted around the town plus brownfield sites need further investigation.

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]
- *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.²¹ 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 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> <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, TR-H5 and TR-H6 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	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21087
Full Name	Anthony and Andrea Phillips
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I first came to Berkhamsted in 1986 to do an MBA at Ashridge. I loved the town then so much that in 2001 when relocating from the Netherlands this town was top of the list. My only concern was then how had the town coped as the High street was so congested as there was no bypass then.

	<p>Now it is already deja vu as the town is now the same pre bypass in terms of congestion.</p> <p>I can travel quicker by bike to all my usual destinations but feel a lot less safe due to much traffic; impatient drivers (linked to bottlenecks e.g. station road) and the condition of the roads. If the Town could just develop an infrastructure plan to deliver much better parking and traffic flow and encourage more cycling (electric bikes like in Germany) etc. then it would be a big step forward. However, this seems a struggle now. So to add on top 1600 houses / 2200 residences (includes the 600 planned) seems a challenge which can't be met (mostly due to the geography). So first develop an infrastructure plan and prove it works before even thinking of building more.</p> <p>Note the big Tesco car park scheme doesn't solve how to get there. Just too many cars for too narrow roads e.g. Station Road.</p> <p>The same applies in many other aspects of daily life here. Here are three examples from last week:</p> <p>1) train to London - it used to be people joining Watford couldn't get a seat then Hemel now Berkhamsted on certain trains - the ones bread winners need to get on.</p> <p>2) doctors - 1 day or 2 days was time to see GP. Last week it was 10 days.</p> <p>With the super GP surgery plans moving towards the sports centre (plus Lidl) what will be the projected journey times by car to get there.</p> <p>Do you have any estimates as this acre the kind of insights which show if you have a workable plan and if the Town can cope.</p> <p>3) Canal Fields Car Park - parking to go and play a tennis match. I couldn't believe that there were 4 cars waiting in front of me as just no spaces. I arrived late for the start of my match. Quality of life is about certainty and not knowing if there is enough capacity at any time is a worry and spoils life. From a working point of view means and a lost of lost time as have to plan for the worst - we already have low productivity as it is.</p>
Include files	
Number	Question 46
ID	LPIO21089
Full Name	Mrs Thelma Gillen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Here are my comments on the proposed local plan:-</p> <ol style="list-style-type: none"> 1 I understand that there is ongoing pressure for new homes but I do not understand why Dacorum, rather than some other parts of Hertfordshire, seems to be bearing the brunt of the proposed housing numbers.

- 1 That said, my focus is on Tring, where I have lived for over 30 years. I have not read anything in your proposals or seen anything at the exhibition you held at Pendley Manor to provide reassurance that Dacorum Planning Dept wishes to maintain the character of what is a small market town with a proud history. Tring is about as far west in Dacorum as it is possible to go before encountering Aston Clinton and Aylesbury, both of which (but especially Aylesbury) seem to be growing out of all proportion. To most people, whether they live here or are visiting, the county boundary is invisible. Do we really want Tring to be consumed into some **endless sprawl of housing** and ignore that fact just because of an invisible line? There has already been a significant expansion of building in Tring (eg the Rose & Crown) and more is proposed (LA5). We only recently had the consultation where LA5 was agreed and we seem now to be back at square 1 and asked to accept yet more building. This is not right; it makes a mockery of the planning process.
- 1 Dacorum comprises different types of settlement - large towns, small towns and villages, each with their own character. A desire to spread development reasonably proportionately among all types of settlement may seem equitable but, if doing so alters the character of some of those settlements irrevocably, it is actually far from fair. For example, Hemel Hempstead is already a large town so adding a number of new homes will not alter its character. Conversely, Tring is a very small town and adding a similar proportion (although a smaller number) of new homes there **will fundamentally alter its character**. It is the alteration of the fundamental character of a place such as Tring that is one of my main concerns as it is neither nor equitable nor fair.
- 1 Another main concern is the **loss of natural countryside**. This is not the same as the 'green space' that can be planned into a housing or industrial development; natural countryside supports its own rare flora and fauna, and is an amenity, not just for people who live adjacent, but for people from far and wide. Large developments on the edge of Tring would result in the loss of beautiful countryside that is an amenity for the people of Tring, Berkhamsted, Hemel Hempstead, etc, in a way that a similar development on the edge of Hemel Hempstead would not. Green Belt countryside was initiated for a reason; that reason is even more valid and pressing now than when Green Belt first came into existence. It would be little short of criminal to build on it. The Tring proposals only offer Green Belt as proposed sites and, apparently, one Green Belt site that was formally AONB. This surely indicates that Tring is at saturation point. We want to maintain our town boundaries and not build on Green Belt.
- 1 Points 3 and 4 would combine to **make Tring a less attractive place** in which to live or work and

	<p>to visit. Tring has a rich heritage, particularly its association with the Rothschilds, and is a modest tourist attraction. Developing it to the extent that it loses its fundamental character and encroaching on its natural countryside would make it a less attractive tourist destination and amenity for Dacorum as a whole, with consequent effect on local businesses.</p> <p>1 Many Tring residents commute to London and this is unlikely to change. An increase in housing will just mean more commuters and it is already impossible to park at Tring Station.</p> <p>Please consider the disproportionate effect of developments on the fundamental character of small towns like Tring and its surrounding countryside; please preserve the Green Belt. Please take into account the proximity of Tring to the new Garden Town of Aylesbury and the expanding village of Aston Clinton. We do not want to live in one continuous building development, stretching from Tring to Aston Clinton/Aylesbury or Tring to Berkhamsted. The Green Belt was designed to prevent this urban sprawl; please ensure that it is maintained.</p>
Include files	
Number	Question 46
ID	LPIO21090
Full Name	Ronald 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 have lived much of my life in Bovington. The proposed development sites for 450 new homes would increase the size of the village by 25%. There are so many existing problems resulting from developments in recent years and others already given planning approval that village cannot absorb any more without a strategic plan to improve the infrastructure and services first. No such commitments have been put forward in this Local Plan.</p> <p>My preferred option is therefore 2B.</p> <p>My main reasons are:-</p> <ol style="list-style-type: none"> 1 The four proposed developments are all on Green Belt which is contrary to Dacorum's Core Strategy to minimise impact on Green Belt and safeguard the countryside. 2 The main routes through the village are already heavily congested. 3 There is inadequate parking in the High Street. 4 School and doctors are at or near capacity. 5 During heavy rain the drains and sewers cannot cope with the existing development.

	Any significant new development would require are more radical plan for the village structure to be implemented first and paid for by the developer.
Include files	
Number	Question 46
ID	LPIO21092
Full Name	Heather Ebdon
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 feel compelled to write to you about the future of DBC. I am against high rise building in DBC. I would like a more fairer ratio of properties being built across DBC - not just using Hemel Hempstead as a 'dumping ground'.</p> <p>I also feel that you have also crossed the line with regards to green belt land. This should be an absolute 'no no'.</p> <p>The South-east is already stretched to the maximum with people and transport and DBC should be protecting residents and recommending that properties be built further north where there is plentiful land.</p> <p>Please don't further ruin Hemel Hempstead - more infrastructure is needed already!</p>
Include files	
Number	Question 46
ID	LPIO21093
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal. (GFRA)</p> <p>I would like to add my personal comments if I may.</p> <p>My partner and I moved here with our children just over two years ago. Already we've fallen in love with the area and the people. We've developed the garden at great expense, using local workmen, and are presently upgrading the house, making a significant investment, again, using local work force. This I hope, reflects our level of commitment to the area and our intent to live here permanently.</p>

This development would mean we would leave. Not in a fit of pique, but because in truth, the proposed 'Grove Fields' area simply cannot support the required infrastructure, and, like many others attracted to the area, we moved here because of the natural beauty, green belt and farming in the area, and the charm of the market town. Otherwise, we could have just as easily have moved to Hemel Hempstead, and found a more densely populated area, with more infrastructure and easy travelling distance to work. We chose Tring because it is an area of natural beauty.

Specifically, the issues are:

(i) Traffic

The traffic is very dense along our road and the route to the station of Grove Fields where the proposed development will be built, while the station itself is under immense strain already.

As it is, it's often impossible to park ones' car near, let alone outside ones' home. When travelling to / from the station one always must queue in significant traffic at peak times, and the junction at Cows Lane is already at peak.

The area is already a hazard, with parents having to be incredibly careful taking children out of cars in constant traffic, or crossing the road to schools.

This would become unsustainable should the development progress as planned.

No matter the suggestions of reports, these are yet to be completed.

Moreover, the plain irrefutable facts are, the existing main and subsidiary road cannot be made wider (due to existing houses either side), and as such, simply cannot take the additional significant traffic flow that would result from a project of this size in the proposed 'Grove Fields' area.

(ii) Drainage

In addition, is the issue of the drains, which though can be modern on the proposed site itself, would require complete modernisation of all drainage from the site to the town of Tring, into which they are proposed to flow.

At present, there are already issues with overflow in heavy rain fall / bad weather.

Replacement of existing drainage would be significant disruption for a prolonged period, at least a year to two years, not to mention expense, even should the report yet to be completed, states it is an engineering feasible option.

(iii) Additional Infrastructure

Additionally, of concern is the other supporting infrastructure, such as doctors, schools, parking and traffic flow through to / from and within the market town of Tring.

Unless this proposal came with significant, thought through and clearly budgeted cash influx to increase school's doctors and the like, all singularly lacking at this juncture, the area simply does not have the capacity for this level of expansion.

	<p>It would require significant infrastructure investment in the surrounding area and Tring, which I understand is simply not available in the budgets for the foreseeable future. Vague promises as set out in the report simply will not suffice.</p> <p>(iv) <u>Lack of solid evidence based impact reports and budgetary commitment</u></p> <p>At the very least, a full and proper impact and costing report needs to be commissioned and made public, so that the discourse for our 'Responses to Issues and Options' is a meaningful one, and not simply a tick-box exercise that the Council finds is open to a lengthy and expensive review process later.</p> <p>Of course, more houses need to be built generally, but the proposed numbers and sites fail to reflect the councils own report, and do not need to be built in that number, in the 'Groves Field' proposed site.</p> <p>(v) <u>Area of natural beauty, Green Belt and Farmland</u></p> <p>Finally, is the issue of the significance of the area being one of natural beauty, which seems to have been summarily dismissed by the proposals.</p> <p>This is an area of green belt, farming and natural beauty. While of course recent government thresholds have made it more acceptable to agree such a site, the threshold is equivalent to one of 'last resort'. Clearly that argument has not been made here, nor has the threshold been met in respect of the numbers of both the proposed number houses required, or the 'Grove Fields' site.</p> <p>The development on the proposed 'Grove Fields' site would have a disastrous impact on the very nature and make-up of the area, along with the farming, wild life, market town, and the enjoyment of the people who live here, present and future.</p> <p>I therefore respectfully request that you do not pass the 'Grove Fields' proposal.</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21101
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal. (GFRA)</p> <p>I would like to add my personal comments if I may.</p>

My partner and I moved here with our children just over two years ago. Already we've fallen in love with the area and the people. We've developed the garden at great expense, using local workmen, and are presently upgrading the house, making a significant investment, again, using local work force. This I hope, reflects our level of commitment to the area and our intent to live here permanently.

This development would mean we would leave. Not in a fit of pique, but because in truth, the proposed 'Grove Fields' area simply cannot support the required infrastructure, and, like many others attracted to the area, we moved here because of the natural beauty, green belt and farming in the area, and the charm of the market town. Otherwise, we could have just as easily have moved to Hemel Hempstead, and found a more densely populated area, with more infrastructure and easy travelling distance to work. We chose Tring because it is an area of natural beauty.

Specifically, the issues are:

(i) Traffic

The traffic is very dense along our road and the route to the station of Grove Fields where the proposed development will be built, while the station itself is under immense strain already.

As it is, it's often impossible to park ones' car near, let alone outside ones' home. When travelling to / from the station one always must queue in significant traffic at peak times, and the junction at Cows Lane is already at peak.

The area is already a hazard, with parents having to be incredibly careful taking children out of cars in constant traffic, or crossing the road to schools.

This would become unsustainable should the development progress as planned.

No matter the suggestions of reports, these are yet to be completed.

Moreover, the plain irrefutable facts are, the existing main and subsidiary road cannot be made wider (due to existing houses either side), and as such, simply cannot take the additional significant traffic flow that would result from a project of this size in the proposed 'Grove Fields' area.

(ii) Drainage

In addition, is the issue of the drains, which though can be modern on the proposed site itself, would require complete modernisation of all drainage from the site to the town of Tring, into which they are proposed to flow.

At present, there are already issues with overflow in heavy rain fall / bad weather.

Replacement of existing drainage would be significant disruption for a prolonged period, at least a year to two years, not to mention expense, even should the report yet to be completed, states it is an engineering feasible option.

(iii) Additional Infrastructure

Additionally, of concern is the other supporting infrastructure, such as doctors, schools, parking and traffic flow through to / from and within the market town of Tring.

Unless this proposal came with significant, thought through and clearly budgeted cash influx to increase school's doctors and the like, all singularly lacking at this juncture, the area simply does not have the capacity for this level of expansion.

It would require significant infrastructure investment in the surrounding area and Tring, which I understand is simply not available in the budgets for the foreseeable future. Vague promises as set out in the report simply will not suffice.

(iv) Lack of solid evidence based impact reports and budgetary commitment

At the very least, a full and proper impact and costing report needs to be commissioned and made public, so that the discourse for our 'Responses to Issues and Options' is a meaningful one, and not simply a tick-box exercise that the Council finds is open to a lengthy and expensive review process later.

Of course, more houses need to be built generally, but the proposed numbers and sites fail to reflect the councils own report, and do not need to be built in that number, in the 'Groves Field' proposed site.

(v) Area of natural beauty, Green Belt and Farmland

Finally, is the issue of the significance of the area being one of natural beauty, which seems to have been summarily dismissed by the proposals.

This is an area of green belt, farming and natural beauty.

While of course recent government thresholds have made it more acceptable to agree such a site, the threshold is equivalent to one of 'last resort'. Clearly that argument has not been made here, nor has the threshold been met in respect of the numbers of both the proposed number houses required, or the 'Grove Fields' site.

The development on the proposed 'Grove Fields' site would have a disastrous impact on the very nature and make-up of the area, along with the farming, wild life, market town, and the enjoyment of the people who live here, present and future.

I therefore respectfully request that you do not pass the 'Grove Fields' proposal

Summary Section from GFRA – Executive summary

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.

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>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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21148
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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</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".
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21150
Full Name	Sheron Wilkie
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 attached report regarding your proposed development in Tring as submission opposing this proposal (GFRA)</p> <p>GFRA Response to Question 46, full document attached to question 46</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" (East Hemel Hempstead) 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</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]
- *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.²¹ 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 is more simply enunciated by Lightman J in R v Director General of Telecommunications, ex parte Cellcom Ltd [1999] COD 105.

Include files	
Number	Question 46
ID	LPIO21151
Full Name	Geoff Henderson
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 write as a supporter of BRAG and The Gravel Path Safety Action Group to register my opposition to the proposed Ivy House Lane housing development.</p> <ol style="list-style-type: none"> 1 The effect it would have on the town's car parking capacity which is already stressed. It is not uncommon for motorists to leave the town because they are unable to park. Associated with this is the intolerable level of street parking which is made worse by those requiring rail transport. 2 Medical and hospital services would be further stressed by the increase in population. 3 Atmospheric pollution would increase. 4 Wildlife would be diminished. 5 Schools would be unable to cope. <p>Frankly Berkhamsted is full and the proposed developments would do much to destroy the natural beauty of the area being proposed</p>
Include files	
Number	Question 46
ID	LP1021177
Full Name	St Albans Diocesan Board of Finance
Company / Organisation	St Albans Diocesan Board of Finance
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • SADBDF is specifically interested in land west of Long Marston, referenced within the SHLAA as site Tw/6. The site was considered as accepted within the SHLAA. However, the Plan makes no reference to such site • The SHLAA noted the following comment in relation to the site: <ul style="list-style-type: none"> • “Site is within the Rural Area and may be suitable subject to further technical work on the Single Local Plan. However, access arrangements will require careful consideration. Adjacent to Conservation Area and Listed Building. Site is available for development.” • SADBDF make it clear the site remains available for development and advanced discussions have been undertaken with an interested local developer. While this is still under consideration, there is established market interest in the site, emphasising that the site can be delivered

	<ul style="list-style-type: none"> To confirm that the site can achieve a suitable access from Station Road SADBf has commissioned an access assessment and access design by Fairhurst. This plan is included at Appendix 2 The site is particularly well related to the existing settlement pattern of Long Marston and forms a logical and proportionate addition to the settlement It is expected the site could deliver approximately 15 dwellings that can contribute to the sustainable growth of the village SADBf strongly suggest the Plan should make suitable provision for sustainable sites at small villages, such as land west of Long Marston
Include files	Richard Butler - Bidwells Representations for DBC IO - SADBf Long Marston Final.pdf
Number	Question 46
ID	LPIO21224
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Question 46 <i>Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?</i></p> <p>Yes</p> <p>General Comment:</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 and 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>I believe 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>

Surprisingly DBC decided to develop a whole new plan rather than just completing the required partial review. In doing so they have 'parked' the issue of St Alban's proposed expansion of East Hemel, but pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.southhants.gov.uk/portal/plan2016/BRAG/BRAG%20-%20Green%20Belt%20Review%20-%20undertaken%20for%20DBC%20by%20SKM%20-%20final%20version.pdf> for a full analysis of stage 1). Both of these stages give a strong impression of 'Confirmation Bias' from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general, rather than an impartial, detailed analysis based on real investigation of the relevant localities.

I agree with BRAG 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. With BRAG I contend 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, I agree with BRAG that that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

I register these objections and also 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 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 – as are the Vision and Objectives - 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 for any proposals to be analysed in detail
- Flooding – SFRA not completed

Berkhamsted is a mediaeval market town situated in a steep sided valley, with services and facilities spread along the linear centre of the town next to the canal. The town has grown substantially over the past few decades, to the extent that this plan is now seeking to build on all the Green Belt around the town – on land that speculative developers are seeking to promote. This was strongly contested at the Core Strategy Inquiry and even pursued by the Council to the High Court to prevent development of the ‘South Berkhamsted Concept’.

David Gauke, MP and James Doe, now Assistant Director for Planning, Development and Regeneration, appeared on deeTV as recently as 2011 to express their opposition to the Berkhamsted development. [<http://www.berkhamstedcitizens.org.uk/2017/11/21/citizens-visioning-2017/>]

As you will see, James Doe stated “The Borough council isn’t supporting this proposal and it thinks that a development of this size is actually too much for the town and not necessarily in the right place.”

The Core Strategy rejected the Berkhamsted sites only four year’s ago, giving detailed reasons why they were not suitable for development – see below for each of the sites. The town does not have the infrastructure to absorb development beyond the ‘Urban capacity’ already planned, as I have identified in answer to the questions below.

The roads especially are a major infrastructure obstacle to development. They are based on the medieval town and are already congested. They cannot be widened to take additional traffic. A suggestion of building an east-west link between Swing Gate Lane [a steep congested road with on-street parking serving two schools] and Chesham Road [one-way for much of its length] can be seen by anyone who knows the town to be a recipe for massive bottlenecks.

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
- 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. 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 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

	<p>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</p> <p>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 are itemised under each of the sites below.</p>
Include files	
Number	Question 46
ID	LPIO21225
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Comments on individual sites</p> <p>Be-h1 Land south of Berkhamsted</p> <p>Core Strategy rejected this option for the following reasons</p> <ul style="list-style-type: none"> • Strong countryside/Green Belt • 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 <p>In addition I make the following objections</p> <p>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</p>

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 [In my view, challenging for all but the most fit]
- 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 [How high would these bunds have to be and then what impact on views from AONB?]
- 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

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

The 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 hearing I attended 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 I would stress:

- The 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 the 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 [a steep congested road with on-street parking serving two schools] and Chesham Road [one-way for much of its length] can be seen by anyone who knows the town to be a recipe for massive bottlenecks 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 – especially with the addition of a high bund as suggested to screen from road noise
- 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 – Ashlyns - inadequate for addition of this level of family housing
- 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, I believe, when there was a national shortage of salt. I can find no evidence that this particular issue has been addressed. [It certainly was not addressed on 10 December 2017 when Swing Gate Lane and all Hall Park roads were inaccessible – and the A41 by-pass was closed, trapping 100 motorists]

- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during traffic surveys conducted by BRAG, it was very rare to see a cyclist, especially ascending 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 to this site. Bus travel might offer a 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. Bus routes have recently been cut in the town due to lack of economic viability
- Suggestion of 'bus loop' is not a viable solution as clearly demonstrated at the 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

	<ul style="list-style-type: none"> • GP / health provision – town struggling to meet current demand. No applications for recent vacancies for GP partners in Berkhamsted. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices • Water and Sewerage problems for the current housing levels that will struggle to sustain planned additional ‘urban capacity’ building and certainly not further development of Green Belt [see Q29]. • 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 of 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’ – this would exacerbate all the problems and block the wildlife corridor even further
Include files	
Number	Question 46
ID	LPIO21226
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Be-h2 Haslam Fields, Shootersway Core Strategy identified the following reasons against development on this site</p> <ul style="list-style-type: none"> • 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

- It fails to meet the Berkhamsted Vision in a series of areas
- 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 when they removed LA4 from Green Belt – they gave assurances at the time that this wouldn’t happen
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 by-pass – increasing car journeys even more
- Potential archaeological remains on the site
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during the traffic surveys conducted by BRAG, it was very rare to see a cyclist, especially ascending the 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 to this site. Bus travel might offer a hope for reducing car use but many of the

	<p>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. Bus routes have recently been cut in the town due to lack of economic viability</p> <ul style="list-style-type: none"> • Suggestion of 'bus loop' not feasible Berkhamsted bus routes have decreased in recent years due to lack of economic viability. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys. • Water and Sewerage problems for the current housing levels that will struggle to sustain planned additional 'urban capacity' building and certainly not further development of Green Belt [seeQ29].
Include files	
Number	Question 46
ID	LPIO21227
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Core Strategy rejected this option for the following reasons</p> <ul style="list-style-type: none"> • Proximity to Chilterns AONB. • Strong countryside/Green Belt boundary would be • Impact on valley sides and important dry valley location <p>In addition I make the following objections</p> <ul style="list-style-type: none"> • It fails to meet the Berkhamsted Vision <ul style="list-style-type: none"> • 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 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 traffic surveys conducted by BRAG, it was very rare to see a cyclist, especially ascending 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 to this site. Bus travel might offer a 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.

	Bus routes have recently been cut in the town due to lack of economic viability
Include files	
Number	Question 46
ID	LPIO21228
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Be-h4 Land between Durrants Lane / Bell Lane / Darr's Lane (two sites)</p> <p>Core Strategy rejected this option for the following reasons</p> <ul style="list-style-type: none"> • 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 <p>In addition I make the following objections</p> <ul style="list-style-type: none"> • Fails to meet Berkhamsted Vision <ul style="list-style-type: none"> • 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 [demonstrating lack of knowledge of locality or topography] – 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 feasible solution. Berkhamsted bus routes have decreased

	<p>in recent years due to lack of economic viability. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys</p> <ul style="list-style-type: none"> • 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 as other sites in Berkhamsted – distance from facilities and services • Water and Sewerage problems for the current housing levels that will struggle to sustain planned additional ‘urban capacity’ building and certainly not further development of Green Belt [see Q29]. Neighbouring houses have experienced rising sewerage following completion of Bearroc development. • Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during traffic surveys conducted by BRAG, it was very rare to see a cyclist, especially ascending 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 to this site. Bus travel might offer a 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. Bus routes have recently been cut in the town due to lack of economic viability
Include files	
Number	Question 46
ID	LPIO21229
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Core Strategy identified the following reasons against development on this site

	<ul style="list-style-type: none"> • 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 <p>In addition I make the following objections</p> <ul style="list-style-type: none"> • 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 – should immediately disqualify this site • 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
Include files	
Number	Question 46
ID	LPIO21230
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Core Strategy identified the following reasons against development on this site</p> <ul style="list-style-type: none"> • 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 <p>In addition BRAG makes the following objections</p> <ul style="list-style-type: none"> • Fails to meet Dacorum or Berkhamsted Vision <ul style="list-style-type: none"> • 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
- Water and Sewerage problems for the current housing levels that will struggle to sustain planned additional 'urban capacity' building and certainly not further development of Green Belt [see Q29]. Neighbouring houses have experienced rising sewerage following completion of Bearroc development.
- 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 traffic surveys conducted by BRAG, it was very rare to see a cyclist, especially ascending 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 to this site. Bus travel might offer a 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. Bus routes have recently been cut in the town due to lack of economic viability

Include files

Number

Question 46

ID	LPIO21231
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Core Strategy rejected this option for the following reasons</p> <ul style="list-style-type: none"> • 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 <p>In addition I make the following objections</p> <ul style="list-style-type: none"> • 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 • Water and Sewerage problems for the current housing levels that will struggle to sustain planned additional ‘urban capacity’ building and certainly not further development of Green Belt [see Q29]. • Sewerage impact on neighbouring houses from adjacent site – Townsend Gate development • 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 hardly credible • 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
Include files	
Number	Question 46
ID	LPIO21232
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • 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"> • 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 traffic surveys conducted by BRAG, it was very rare to see a cyclist, especially ascending 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 to this site. Bus travel might offer a 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. Bus routes have recently been cut in the town due to lack of economic viability
Include files	
Number	Question 46
ID	LPIO21271
Full Name	Sarah Lightfoot
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account. I strongly support their submission (below)</p> <p>The Chilterns Conservation Board objects to the allocation of sites in the AONB Tr-h4 and Be-h8 and makes a holding objection to all the sites in the setting of the Chilterns AONB, pending proper assessment of the impact of developing the sites on the AONB:</p> <p>HEMEL HEMPSTEAD</p> <p>HH-h1a North Hemel Hempstead (Phase 1)</p> <p>HH-h1b North Hemel Hempstead (Phases 1 and 2)</p> <p>BERKHAMSTED</p> <p>Be-h3 Land at Ivy House Lane</p> <p>Be-h4 Land between Durrants Lane / Bell Lane / Darr's Lane (two sites)</p> <p>Be-h5 Land at Lockfield, New Road, Northchurch</p> <p>Be-h7 Land at Bank Mill Lane</p> <p>Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane (in Chilterns AONB)</p> <p>TRING</p> <p>Tr-h1 Land to the north of Station Road</p> <p>Tr-h2 Land west of Marshcroft Lane</p> <p>Tr-h3 Land at Ickniel Way / Grove Road (New Mill)</p> <p>Tr-h4 Land at Cow Lane / Station Road (in Chilterns AONB)</p> <p>Tr-h5 Land at Dunsley Farm, London Road</p> <p>Tr-h6 Land north of Ickniel Way (Waterside Way)</p> <p>MARKYATE</p> <p>My-h1 Land south of Markyate</p> <p>My-h2 Land at Pickford Road</p> <p>OTHER SETTLEMENTS</p> <p>O-h1 Land at Old Kiln Meadow, Water End Road, Potten End</p> <p>There are gaps in the evidence base for the Local Plan on assessing impacts on the AONB. The emphasis of the work so far is the Green Belt. Landscape is a late add-on to the Green Belt study, and shows little understanding of AONB impacts. There is not even a map showing the AONB boundary in the Arup work. The landscape work at a site level is mainly desk based and not detailed enough. It is overly focussed on whether the land parcel exhibits the special qualities of the AONB, which is not what Government policy or legislation says: Countryside and Rights of Way Act 2000 sec 85: "have regard to the purpose of conserving and enhancing the natural beauty of the AONB" - all of it, not just the subset of areas which happen to contain the special qualities. Furthermore not all AONB impact are visual or come under the heading of landscape eg effects on tranquillity, ecology, air pollution, dark skies. The message from the Planning Inspector re: the proposed Dacorum BC Site</p>

Allocation in the AONB west of Tring needs to be heeded. The Planning Inspector concluded "I have reflected on what I heard at the hearing sessions where this site was discussed, as well as the submitted written evidence. On the basis of this verbal and written evidence I have serious concerns that the gypsy and traveller site element of site LA5 is unsound. This is because of the lack of a formal assessment by the Council to assess its likely impact on the Chilterns Area of Outstanding Natural Beauty (AONB) and in particular whether it would conserve and enhance the natural beauty of the AONB... In conclusion, for the Plan to be found sound the Council will need to, as a minimum, advance main modifications to remove reference to the provision of a gypsy and traveller site as part of LA5".

The Schedule of Site Appraisals Sustainability Appraisal Working Note is flawed because being in the setting of the AONB has been given no greater weight than sites outside the AONB setting. For example, sensitive AONB setting sites like Be-h3 Land at Ivy House Lane has been scored exactly the same (one orange cross: "the option is likely to have a negative effect which is not significant") under SA9 Landscape as sites further distant from the AONB at Kings Langley or Bovingdon.

The Chilterns Conservation Board is willing to help with a brief for a study of the impacts of proposed allocations on the Chilterns AONB, as we have with a similar assessment for the emerging Chiltern and South Bucks Local Plan.

The statutory Chilterns AONB Management Plan 2014-2018 explains how developments outside the AONB but in its setting can affect the AONB. and includes the following policies:

Vision: The setting of the Chilterns is valued and protected by ensuring development adjacent to the AONB also respects its national importance.

Policy L4: The distinctive character of buildings, rural settlements and their landscape setting should be conserved and enhanced.

Policy L5: Developments which detract from the Chilterns' special character should be resisted.

Policy L7: The quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns.

Policy L8: Landscape close to existing and new areas of development should be maintained and enhanced to conserve, enhance and extend: natural capital; green infrastructure; character and amenity; biodiversity; and opportunities for recreation.

Policy D8: The retention or creation, and long term maintenance, of green infrastructure should be sought when development is proposed in, or adjacent to the AONB.

Policy D9: Full account should be taken of the likely impacts of developments on the setting of the AONB.

There is further advice in the Chilterns Conservation Board's Position Statement on Development Affecting

the Setting of the AONB, available at <http://www.chilterns.org/conservation/development/positionstatement.html>
It identifies that:

Examples of adverse impacts include:

- Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way;
- Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB;
- Breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and/or movement (viaducts, chimneys, plumes or rotors for example);
- The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways;
- Loss of tranquillity through the introduction of lighting, noise, or traffic movement;
- Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB;
- Change of use of land that is of sufficient scale to cause harm to landscape character;
- Loss of biodiversity, particularly in connection with those habitats or species of importance in the AONB;
- Loss of features of historic interest, particularly if these are contiguous with the AONB;
- Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes, and
- Increase in air or water pollution.
- Adverse impacts might not be visual. The special qualities of the Chilterns AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB.

The Council must give great weight to the Chilterns AONB (NPPF para 115) and is under a legal duty to have regard to the purpose of conserving and enhancing the natural beauty of the Chilterns AONB (Countryside and Rights of Way Act 2000 section 85) The Chilterns AONB is nationally protected as one of the country's finest landscapes, and has the same level of protection (the highest) as National Parks (NPPF para 115). The location of growth should be informed by sustainability appraisal and assessment of the cumulative effects on development on the Chilterns AONB, including effects on natural beauty, ecology, habitat fragmentation, air quality, tranquillity, water abstraction from chalk streams, visitor pressure etc. Please see the recently published guidance from the Chilterns Conservation Board: Position Statement on Cumulative Impacts of Developments on the Chilterns AONB which should be of assistance in identifying effects and assessing them, it is available online at <http://www.chilterns.org/conservation/development/positionstatement.html>

Include files	
Number	Question 46

ID	LPIO21283
Full Name	Sarah Lightfoot
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 support the Chiltern Countryside Group's submission regarding the Green Belt and AONB (below)</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>
Include files	
Number	Question 46
ID	LPIO21295
Full Name	Sarah Lightfoot
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 support the Chiltern Countryside Group's submission regarding the Green Belt and AONB (below)</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	

Number	Question 46
ID	LPIO21297
Full Name	Sarah Lightfoot
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 support the Chiltern Countryside Group's submission regarding the Green Belt and AONB (below)</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	LPIO21300
Full Name	Nigel Emms
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Having reviewed proposals for future development in Flamstead I have a number of issues and concerns.</p> <p>Firstly I trust that Flamstead Parish Council has made Dacorum Planning fully aware of the results of the Village Survey undertaken in August 2016 . The survey , a copy of which is attached, clearly states that 68 % of the 450 respondents do not support any major developments. In round terms there is a clear majority against the possibility of exploring further development.</p> <p>In response to Question 46? I have a personal interest in site WA/8 (Land South of Trowley Heights, Flamstead) identified in the Strategic Housing Land Availability Assessment 2016. The site immediately adjoins my own home and I would observe as follows:</p> <ol style="list-style-type: none"> 1 The site lies within the Green Belt and is traversed by footpaths (see:

<http://webmaps.hertfordshire.gov.uk/rowtown/?layers={1,0,1,2,3,4}>, which I would assume must be preserved. However, the footpaths at present afford users a view across an immediately adjoining Area of Outstanding Natural Beauty: a view upon which any housing development would directly encroach.

- 2 The availability of the site would depend upon vehicular access that is not currently secured. Such access would be via a plot identified under Land Registry Title Number: HD277637 (described as 'Land on the South East Side of Friendless Lane, Flamstead'). The land is in private ownership and subject to various charges and covenants. Part of the land is laid out as a public car park, under the control and management – but not the ownership – of Flamstead Parish Council. The car park serves the adjoining Recreation Ground, but is also used by walkers. The viability of the site for housing development would depend upon acquisition of this plot and the loss of the car park.
- 3 Any development would increase the number of cars accessing and exiting the area. At present Friendless Lane is already busy and single track in a number of places. Also any new property is likely to own up to 3 cars. There is also the issue of exiting the village onto the A5183 which is a known and ongoing issue .
- 4 Sewage from any development would need to connect with the existing gravity sewer at the junction of Friendless Lane and Mill Lane (by the entrance to the abovementioned car park). In 2007 the flow into that sewer was dramatically increased (from an average of 0.69 litres per second to an average of 14.68 litres per second) as a result of the rerouting of pumped sewage from some 302 dwellings in Trowley Bottom. According to data provided at that time by Thames Water the maximum capacity of the Friendless Lane sewer is 16.33 litres per second. The sewer is therefore now running close to its maximum capacity and in the event that it should be required to accept sewage flows from more than a handful of additional dwellings, it would need to be replaced. Clearly, the disruption such infrastructural works would cause would be considerable and wholly disproportionate in relation to the benefits from the limited development possible on the site proposed.

I hope my comments will be seen as constructive and taken into account in any future development proposals for Flamstead particularly in light of the recent village survey.

Include files	Nigel Emms - Flamstead future survey
Number	Question 46
ID	LPIO21301
Full Name	Raymond Potter
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Re plans.to develop area Tr-h1-2-3-4</u></p> <p>I strongly object to the above areas being developed. We moved to Tring for its size and intimacy. The area around Grove Road has seen, and is seeing, a large amount of in-filling which is already having an effect on this area of outstanding beauty.</p> <p>I have regularly walked the area from Grove Road through to the Ridgeway Path for many years which has been a delight. Any development in this area would have a detrimental effect on the life and health (and mental health) of the many residents walking Marshcroft Lane and surrounding fields.</p> <p><u>As way forward</u></p> <p>If Tring has to accept any development, I would urge Dacorum to look at the area near Duckmore Lane. I feel that if there has to be any development in the town, the area where the allotments are would be the best place, the houses would simply nestle in the valley.</p>
Include files	
Number	Question 46
ID	LPIO21347
Full Name	Antony Harbidge
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 accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>On a personal note, I resent that myself and many other caring residents have to spend hundreds of hours dredging through the reams of reports produced by and</p>

on behalf of DBC Planning (at great expense no doubt), while we are trying to run a business or hold down a job and have a family life. Most of these reports, simply being pro-development propaganda, in particular your two confirmation biased Green Belt reviews, which at best advertises the ignorance of the authors to our area, or at worst contain downright lies.

The term Planning suggests that there is some thought and logic being applied to ensure that we get “the right homes in the right places”, but there is very little evidence of that within your documents. Indeed it was confirmed at the Exhibitions that for the options the distribution of housing “between the towns just seemed the fairest solution”. There has clearly been no consideration of topography, the lack of infrastructure or the amount of past or already planned development.

Back in 2012 Mr James Doe (the Assistant Director for Planning, Development and Regeneration) is on public record saying that the then SBC proposal was “too much for the town”. Now his department is proposing numbers far in excess of that, yet nothing has changed in terms of infrastructure or the historic linear, valley setting of the town. This is not planning.

It is argued that the need for housing has increased. But that doesn’t change the physical constraints of the area. What was “too much for the town” then, is “too much for the town” now. DBC Planning are throwing the baby out with the bath water in completing a whole new plan instead of simply doing the partial review requested by the Core Strategy Inspector. The Inspector was not satisfied that DBC had assessed the true need numbers, but he also stressed that the need number is not required to be the housing target if physical and infrastructure constraints mean that the numbers cannot be built. At no time did he suggest more houses should be built in the area within the Dacorum Borough Area, just that he wasn’t convinced that DBC had assessed the numbers properly.

So, it is a simple argument for DBC to make, certainly in terms of Berkhamsted, because the town does not have the infrastructure and over development will destroy the historic setting of the town, which the Inspector agreed needed to be protected. The Inspector also fully agreed with the Hierarchy principals in the Core Strategy, which focused development on Hemel. But, now it seems that DBC Planning wish to discard the hierarchy. It seems clear that DBC Planning are faltering under developer pressure to build in areas that generate the most profits, i.e. Berkhamsted, but demand to build in an area is not a reason build there.

BRAG response to Question 46 (full document is attached)

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

~~(as was clearly stated in the DBC Guide to Review of DCS 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

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.
- 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
- 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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Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO21393
Full Name	Helen Kington
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 accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>Please accept this email as a formal response from both myself and my wife, as separate individuals, to your consultation. My e-mail address is used on the DBC portal for the official BRAG response but this is our personal response to the consultation.</p> <p>Naturally we agree fully with BRAG's response (copy attached) and request you duplicate them individually under our separate names for the purposes of any analysis/reports generated from this consultation.</p> <p>On a personal note, I resent that myself and many other caring residents have to spend hundreds of hours dredging through the reams of reports produced by and on behalf of DBC Planning (at great expense no doubt), while we are trying to run a business or hold down a job and have a family life. Most of these reports, simply being pro-development propaganda, in particular your two confirmation biased Green Belt reviews, which at best advertises the ignorance of the authors to our area, or at worst contain downright lies.</p> <p>The term Planning suggests that there is some thought and logic being applied to ensure that we get "the right homes in the right places", but there is very little evidence of that within your documents. Indeed it was confirmed at the Exhibitions that for the options the distribution of housing "between the towns just seemed the fairest solution". There has clearly been no consideration of topography, the lack of infrastructure or the amount of past or already planned development.</p> <p>Back in 2012 Mr James Doe (the Assistant Director for Planning, Development and Regeneration) is on public record saying that the then SBC proposal was "too much for the town". Now his department is proposing numbers far in excess of that, yet nothing has changed in terms</p>

of infrastructure or the historic linear, valley setting of the town. This is not planning.

It is argued that the need for housing has increased. But that doesn't change the physical constraints of the area. What was "too much for the town" then, is "too much for the town" now. DBC Planning are throwing the baby out with the bath water in completing a whole new plan instead of simply doing the partial review requested by the Core Strategy Inspector. The Inspector was not satisfied that DBC had assessed the true need numbers, but he also stressed that the need number is not required to be the housing target if physical and infrastructure constraints mean that the numbers cannot be built. At no time did he suggest more houses should be built in the area within the Dacorum Borough Area, just that he wasn't convinced that DBC had assessed the numbers properly.

So, it is a simple argument for DBC to make, certainly in terms of Berkhamsted, because the town does not have the infrastructure and over development will destroy the historic setting of the town, which the Inspector agreed needed to be protected. The Inspector also fully agreed with the Hierarchy principals in the Core Strategy, which focused development on Hemel. But, now it seems that DBC Planning wish to discard the hierarchy. It seems clear that DBC Planning are faltering under developer pressure to build in areas that generate the most profits, i.e. Berkhamsted, but demand to build in an area is not a reason build there.

BRAG response to Question 46 (full document is attached)

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
~~(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 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 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.

- 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
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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

	<ul style="list-style-type: none"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO21394
Full Name	Margaret McHugh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	While I understand there is a need for new housing in Tring it seems to me that the proposed housing, as described, is not being considered to meet potential local needs in but rather aimed at displacement from London

for those who can no longer afford to live there and whose higher value London property sale will allow them to buy mid to top of the range properties in the Tring area. There is little suggestion of truly affordable housing based on the average income of the local community.

The next point is that those moving out from London will be requiring transport to their jobs in London as the local area does not have the range of employment nor the potential to employ the proposed numbers and the current station, road access, station parking and public transport are already inadequate for current usage.

My biggest concern is where are the infrastructure proposals to support all this additional housing. There is only a mention that infrastructure would be required not any kind of proposal or schedule of implementation which would need to be well advanced prior to any planning approval being given.

They should be an integral element of this proposal with budget allocated for transport, and basic services i.e. utilities most particularly water supply and sewage.

Water Supply

The water supply in the area is dropping and already barely adequate for current needs. When asked about this during the open day at Pendley Manor I was told by the council representative that they had been told when this point was raised that there is no problem which is contrary to Defra reports which clearly state there is a serious and increasing problem of supply and demand in the area.

On transport.

Bus services in the area are extremely limited and not a reliable or viable means of transport to a place of work outside Tring town centre nor to Tring Station for those travelling into London or north/west out of the area for work. Train travel in the area is not affordable and for commuting it is out of the reach of the average wage earner. The annual basic cost of commuter travel to London Euston alone from Tring from 2018 is £4,204 and if onward travel in London is included is £5,192 and effectively means that it is affordable only to those on higher incomes not the current residents in the area in need of affordable homes. Travellers from Tring are penalized for taking direct trains to Euston and can get no benefit from the reduced fares within the Oyster card zone which would make transport considerably cheaper.

Access to the station itself

Access for pedestrians is very poor as there is little or no footpath beyond the station towards Aldbury.

Tring station car park is already oversubscribed and full by 9am on most days, often before.

There is no availability for overflow parking in nearby streets.

The current car park already marks a horrible scar on the countryside scene at this primary visitors' gateway to the Ridgeway walk, Ashridge and the local AONB and should not be further blighted by expansion of the car park and further decimation of the local scene and

landscape surrounding Aldbury and Ashridge in the AONB.

In addition the access roads are barely adequate for the current level of traffic and accidents in the area by Tring Station are becoming more frequent as there is no clear drop off area resulting in serious congestion at the entrance to the station forecourt and on Station Road on a daily basis.

Public road transport in the area of Tring is abysmal and there is a very limited bus services to access the station. Again Station Rd is not suited to a huge increase in public or private transport without it being straightened and considerably widened which would be inappropriate for the setting as an access road to the AONB.

Cycling is proposed as the option to be promoted but it is not a safe option. The roads in the area are too narrow, they already carry a high volume of traffic at peak times and are poorly lit at night if at all. At present the cycle path on Station road is in such poor repair it is not used as it is downright dangerous after dark. Lighting the whole of Station Road with high level street lights would cause unnecessary light pollution adding to the 24/7 blaze of light of the always, and unnecessarily, lit station car park.

New Housing

The proposal for over 1000 new houses at site TRH1 along Station Rd is completely inappropriate and contradictory to the aim of the Green belt and the settlement pattern as laid down in definitions for Local Hertfordshire Purpose to prevent towns from merging and maintain the current pattern. The parcel of land in question provides a clear open setting, or buffer against sprawl and encroachment as described in the criteria for assessment.

New housing requirements in communities such as Tring would be better fulfilled by small and more community focused developments with the appropriate services available ie schools, doctors, shops, sports/recreational facilities instead of

These proposals seem to be addressing the shortage of affordable housing in London not local needs.

In response to the specific questions posed.

It is too generalized and doesn't address the local conditions in the smaller towns.

Healthcare ie the already under pressure Stoke Mandeville hospital and the lack of an accessible hospital in the borough is touched on but I saw no resolutions proposed.

Commuters outside the county already use Tring station and the car park. New housing within those boroughs will add to this pressure and I did not see this addressed.

The boxes seem to have been ticked

By all accounts the current plans will, in the smaller towns, decimate the concept of the first sentence.

The vision as stated in paragraph 2

The natural beauty of the Chiltern Hills and the varied character of the countryside is admired and cherished.

The countryside is actively managed and supports a healthy local economy and diversity of wildlife. Water quality in the rivers is good and towns and villages have sufficient water supply. Local housing needs have been met, with the impact on the countryside minimised through making effective use of previously developed land in the towns and villages.

is not reflected in the proposals put forward.

I don't believe that the majority of the new homes proposed will be within the means of those in need of housing within the local communities. They will only be affordable for those displaced from London by the overpriced property market who will be commuting in to their better paid jobs.

The proposal for large numbers of new houses in and around small historic villages such as Tring is inappropriate from all aspects: access, services, utilities, transport and employment. The town is already overwhelmed and will have difficulty coping with the developments already approved as there are neither the facilities, services, utilities supply -specifically water, transport or road access nor employment in place or expected to support current levels of expansion. The new residents will need to travel out of the area for employment. As such the proposals are bringing Tring closer to being a dormitory town for workers who cannot afford to live in London.

Looking at previous developments in the area they do not in any way reflect the character of the area. They are cookie cutter houses overbuilt on small plots to maximize return per square foot with minimal investment in quality architecture.

No. The proposals will completely alter the local community with the proposed introduction of so many large scale developments. I cannot speak specifically for the other towns though I do believe that adding large developments of 100 and more houses to small towns such as Tring and Kings Langley have a negative impact on the community and stretch services beyond their limits. It is a fact that doctor's surgeries are closing down and not being replaced so to imagine that small towns can attract the service providers to sustain such increases in population is unrealistic. The towns are too small to sustain well maintained quality facilities which will result in people travelling out of the area for services and facilities in contradiction of the sustainability at the core of the proposals.

In principal, it sounds nice and says all the right things but I don't see the structure and manpower, nor checks and balances in place to follow it through to execution and fulfillment. Too much is left to developers and they are not investing in communities their business is extracting maximum profit from their development at minimum cost.

I'd like to see a proposal of how these policies will be effected. Without one they are meaningless.

Include files

Number

Question 46

ID	LPIO21395
Full Name	Margaret McHugh
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>New Housing</p> <p>The proposal for over 1000 new houses at site TRH1 along Station Rd is completely inappropriate and contradictory to the aim of the Green belt and the settlement pattern as laid down in definitions for Local Hertfordshire Purpose to prevent towns from merging and maintain the current pattern. The parcel of land in question provides a clear open setting, or buffer against sprawl and encroachment as described in the criteria for assessment.</p> <p>New housing requirements in communities such as Tring would be better fulfilled by small and more community focused developments with the appropriate services available i.e. schools, doctors, shops, sports/recreational facilities instead of</p> <p>These proposals seem to be addressing the shortage of affordable housing in London not local needs.</p>
Include files	
Number	Question 46
ID	LPIO21410
Full Name	James Good
Company / Organisation	Angle Property Limited
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<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 note which accompanies it? [Answer is Yes</p> <p>Rectory Farm (KL-h2)</p> <p>APL is the preferred purchaser of Rectory Farm, which is one of the locations identified in the Schedule of Sites (KL-h2) for housing development. An assessment has been made of it, including exploring the main land use issues and looking at sustainability matters surrounding the development of this site. The site is additionally recognised by the Council as one of the key site options being considered around Kings Langley. Table 1 (below) provides a summary of information contained for the site on the “<i>Kings Langley Site Options Board</i>”.</p>

Kings Langley

Site Address

Estimated Site Capacity

Other potential infrastructure provision

KL-h2

Land at Rectory Farm

To be confirmed. Estimated to be around 80 homes

Potential to also deliver:

- 40% affordable housing.
- Open space
- Contributions towards wider infrastructure improvements for the village.

Planning Objectives

The overarching objectives of the draft Plan are set out at 4.2. This comprises:-

- Sustainable Development (eight criteria);
- Strengthening Economic Prosperity (five criteria);
- Homes and Community Facilities (two criteria);
- Looking after the Environment (four criteria); and
- Infrastructure and Delivery (two criteria).

Whilst the second criterion is less relevant to housing development, for the reasons that we set out below, APL considers that the site performs well in relation to the other four objectives.

Site Location and Characteristics

Kings Langley is situated north of the M25, and south of Hemel Hempstead. The A4251 runs through the town providing direct connections to both the motorway and to Hemel Hempstead.

The Rectory Farm site extends to c.8ha. It is situated between the A4251 Hempstead Road to the west and the River Gade / Grand Union Canal (and beyond it the railway line) to the east. There is an existing access from the residential street off Gade Valley Close to the south. Gaywood Park playing fields, home of Kings Langley FC, are to the north. It is currently designated as Green Belt.

As the image at Figure 1 below shows, there is housing to the west of the site, and housing / commercial units east of the canal, which extend as far north towards Hemel Hempstead as the subject site. Accordingly, development on the site will not reduce the gap between the settlements of Hemel Hempstead and Kings Langley.

The site is almost entirely within flood zone 1, with a very limited area at higher risk of flooding along the eastern boundary. Development of the site can therefore be undertaken in accordance with the fourth criterion of the Looking after the Environment Objective.

Access to Jobs, Homes, Facilities and to Public Transport

Kings Langley provides jobs, services and public transport connections. There are a number of business parks, including one immediately to the east of the canal. Further jobs as well as services are provided in the village centre, a short walk to the south of the site. Other facilities are provided just outside the centre, such as the hotel and pub / restaurant to the west of Hempstead Road. The A4251 is a bus route providing public transport connections to employment opportunities within Apsley and Hemel Hempstead. There is also a station further south within Kings Langley.

The site is therefore well situated for residential development to enable residents to have convenient access to jobs, homes and other facilities, with accessibility that should minimise the impact of traffic and reduce the overall need to travel. This accords with the fourth of the eight criteria identified by the Council for sustainable development.

Re-Use of Previously Developed Land

It is noted that under Issue 26, what principles should be used when choosing growth locations, that maximising the use of brownfield land for development is at the top of the locational principles for development. APL agrees that this should be a priority.

The site is, in part, brownfield as it currently contains 4,466 sq m of employment floorspace in a range of relatively low-quality buildings. There is no protection in policy terms for the existing employment provision on the site. The Council has recognised in the Schedule of Site Appraisals (October 2017) that the replacement of these existing buildings on the site could improve local visual amenities.

Whilst the site is currently in the Green Belt, Paragraph 89 of the NPPF states that:

“A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”

Therefore, the southern part of the site has the opportunity to be redeveloped for housing irrespective of the Green Belt designation. Removing the site from the Green Belt offers the opportunity for the site to be more comprehensively planned.

The sixth of the eight criteria of sustainable development is to ensure the effective use of existing land and previously developed sites. The proposed development accords with this.

Healthy and Sustainable Communities, Safe and Attractive Environments, Enhanced Function Character and Open Spaces

The site also accommodates the Kings Langley Community Farm where Transition in Kings grow vegetables to sell at the monthly local food market. Such

facilities could be expanded as part of any development proposals.

Public access to the site is currently limited. Access to the canal is difficult and the function and character of this eastern boundary is of a poor quality. There is no good quality pedestrian or cycle connection through the site to the football club in the north.

Redevelopment, potentially along the lines shown in Figure 2 above, offers the opportunity to promote a healthier and more sustainable community in this part of Kings Langley, through an expanded community farm and additional open space, and improved public access to the canal and to the football club. This could create safe and attractive environments for occupants of the new housing and other residents of Kings Langley, enhancing the function and character of this part of the village and the relationship of it to the countryside beyond. Allocation and redevelopment of the site can therefore accord with the first, sixth and eighth criteria of sustainable development, as set out by the Council, as well as the first criterion of Looking after the Environment.

Green Belt

It is recognised that the site is currently within the Green Belt. As noted above, partial redevelopment of the site can be justified even if the existing Green Belt designation is retained.

The Green Belt Review Stage 1 (November 2013) and Green Belt Review Stage 2 Review and Landscape Appraisal (December 2016) undertaken on behalf of the Council identify that the site is suitable for release from the Green Belt concluding that the release of this site from the Green Belt would not compromise the ability of the wider Green Belt to meet its purposes. We support this and propose removal of the site from the Green Belt.

As noted above, development of the site will not reduce the gap between the settlements of Hemel Hempstead and Kings Langley and therefore will not increase the chances of coalescence of the two settlements.

APL therefore considers that the size and location of the site means that, removal of it from the Green Belt is justified, and that this offers the opportunity to facilitate a more sustainable development in accordance with the five overarching objectives of the draft plan.

Meeting Needs

APL has submitted representations to you in response to other questions that you have asked including our views on the vision for the Borough and for Kings Langley, the objectives for the new local plan, the approach to housing targets and the distribution of new development, as well as site selection.

The draft Plan confirms that the Borough has a population of 153,000 people in 64,000 households – an average of c.2.39 people per dwelling. Kings Langley has a population of c.5,2131 people. This equates to c.2,181 dwellings at 2.39 people per unit. This means that c.3.4% of the population of Dacorum lives in Kings Langley.

For the reasons set out in other representations, APL considers that the Council's housing target figures (Option 2) are the most suitable at this stage, although it is considered that these should be kept under review as the Government's methodology is confirmed. This amounts to some 17,388 new homes across the district. Of this, the Council has identified capacity for 10,940 new homes on land excluding Green Belt sites such as at Rectory Lane. The table at section 10.4 indicates that just 50 units would be provided at Kings Langley which is less than 0.5% of the identified capacity.

Clearly the 0.5% growth identified for Kings Langley is well below the 3.4% size of the village in relation to the population of Kings Langley as a whole. APL considers that growth in settlements such as Kings Langley should be proportionate to its size and role within the District. Were the 10,940 houses for which capacity has been identified distributed evenly, then 372 new dwellings would be delivered in Kings Langley.

Growth based upon Option 2, c.17,388 new homes, would facilitate 591 units in Kings Langley, if distributed evenly across the district. Even the lower 13,846 target based upon the Government's lower thresholds would warrant 470 new houses in the village. Accordingly, APL considers that whichever growth option is selected, that more new homes should be delivered in Kings Langley. The table at Section 10.4 of the Plan indicates that, in addition to the 50 units of the identified housing capacity, 380 further homes would be provided under Option 2C. i.e. 430 new homes in total in Kings Langley (the equivalent figure for 1C is 330). This relates to 2.5% growth under Option 2C (2.4% under Option 1C).

APL also considers that there should be a proportionate increase in housing in settlements such as Kings Langley which are not reflected in the figures in the table at 10.4. However, even if Kings Langley receives a disproportionately low amount of new dwellings the:-

Green Belt land is required to meet the needs. For the reasons set out in these Representations, Rectory Lane is an excellent location to meet that need

- Such provision in Kings Langley will still accord with the Council's objective to promote residential and other development in Hemel Hempstead, Berkhamsted and Tring (the fifth of eight sustainable development criteria of the Council).

Indeed, the inclusion of a larger community farm, access to the canal including open space as well as connections through the site to the football club will ensure that the scheme provides a range of social, leisure and community facilities and services in accordance with the second Homes and Community Facilities criterion.

(see attached document for Figure two - **Potential Scheme Layout**)

Promoting Social Inclusion and Cohesiveness and a Mix of Homes

The layout plan above shows that at least 80 of these units could be provided at Rectory Lane. This could be provided in a variety of unit sizes. On the basis that 35-40% of these units are affordable this amounts to

28-32 affordable units. Such a scheme will meet the requirements of the first criterion of Homes and Community Facilities, by providing a mix of new homes to meet the needs of the local population. It will also promote social inclusion and cohesiveness, in accordance with the third criterion of the eight Sustainable Development criteria set out by the Council.

Other Services and Infrastructure Requirements

The site is well located to local amenities including the village centre, as well as to the road network and local buses. As such the occupiers of the new development will support the provision and retention of such facilities.

Any residential scheme would need to be well designed, in terms of layout / density, landscaping / wildlife and connectivity. It would also need to address climate change through the mitigation of impacts arising from it² such as the inclusion of renewable resources and carbon emission reduction techniques in accordance with the second criterion of Looking after the Environment.

The development will clearly need to be suitably served by related infrastructure in accordance with the Infrastructure and Delivery Requirements of the Plan.

Conclusions

We conclude that the removal of the site from the green belt and designation of it for housing will accord with the overarching requirements of the draft plan for sustainable development, suitable Homes and Community facilities, Looking after the Environment as well as Infrastructure and Delivery. It is agreed that the site should be released from the Green Belt. The development of it will not increase the feeling of coalescence between Hemel Hempstead and Kings Langley. Rather, such development will meet local needs at a location well related to the village centre and other employment opportunities, close to public transport, and in a form that can deliver other community benefits.

² In accordance with the second criterion of Sustainable development.

Review of Site Appraisal

There are a number of key issues identified in the Site Appraisal (October 2017) document. These are set out below and a summary of how the indicative scheme responds to these points is provided.

Matter Raised

Response

Loss of employment land

The site is not a designated employment site. The site currently provides employment for a small number of people, the density of employment is not comparable to other developments of a similar use.

	<p>Loss of greenfield site</p> <p>Part of the site is currently previously developed land. Therefore the development can be accommodated without a significant loss of greenfield space.</p> <p>Interaction with canal frontage</p> <p>The canal frontage will be opened up where possible having regard to necessary controls.</p> <p>Existing TPOs</p> <p>The scheme has been designed to work with the existing groups of TPO trees. As part of the development these trees will be assessed and necessary management undertaken to ensure their long term future health in discussion with the Local Authority.</p> <p>Improve relationship of the site to the adjacent football club</p> <p>It is proposed to enter into discussions with the football club with regard to discussing any improvements that can be made.</p> <p>Oil pipeline buffer zone</p> <p>The indicative scheme has been designed around the oil pipeline buffer zone which provides a natural break through the site.</p> <p>Potential to deliver a modest range of on-site facilities</p> <p>The indicative scheme includes a relocated area for the community farm and the provision of a new building.</p> <p>Potential to deliver on-site play space, open spaces and footpath links and canal side improvements</p> <p>As the indicative layout at Figure 2 shows the development comprises large areas that can be used to deliver play and recreational space and improve access to the canal for all residents.</p>
Include files	Penny Moss Angle Property Ltd - Representations on behalf of Angle Property Figure two.pdf
Number	Question 46
ID	LP1021436
Full Name	Mr R Smith and Mr A Lyell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Question 46: Specific Comments on sites Yes New Site Land east of Pickford Road and south of Markyate</p> <p>1.34.1 The Landowners are specifically interest in the growth options at Markyate and has submitted along</p>

with these representations a call for sites submission for land at Markyate. The site plan is provided at Appendix 1. The full Call for Sites Submission is Appendix 2.

1.34.2 The Landowners notes that the Plan includes two sites for development at Markyate. The Landowners sites adjoins the southern boundary of site (My-h1).

1.34.3 The Plan indicates that site My-h1; Land south of Markyate could provide new infrastructure in the form of Primary School, Secondary School, Health Facilities, Transport Improvements, Local Store, Community Hall, Park including playing pitches, allotments and MUGA) and employment; . It would not be possible for the site to deliver all of these items as well as residential development; and it is also unclear whether DBC have formally tested whether all of the items listed are required; or viable or are reasonable to require. However, it is clear that site My-h1 does not provide the most logical location for the provision of services for the village; and is also located furthest from existing services

1.34.4 Regarding existing infrastructure requirements for Markyate; there is also an existing issue with highway junction capacity at the junction of Pickford Road and Buckwood Road with High Street

1.34.5 It is also understood that many of the children in Markyate attend the secondary schools in Harpenden, and will also benefit from the new 6 form entry school being built in Harpenden

1.34.6 The Landowners suggest that removal of the land parcels from Green Belt in addition to site My- h1 could provide significant betterment in opportunities for sustainable growth for Markyate

1.34.7 Cumulatively the land parcels along with site My-h1 would be likely to deliver circa 350-400 dwellings. But most importantly, the Landowners suggests that the proposed parcels of land have the potential to facilitate the following for Markyate:

- c170 - 220 homes;
- Up to 40% affordable housing;
- New open space and/or children's play area;
- New sports pitches and facilities;
- Site for a new GP surgery /health centre;
- Contributions towards wider infrastructure improvements for the village;
- Potential for a direct road link joining Pickfords Road with London Road, avoiding the bottleneck junction in the centre of the village and reducing issues of highway capacity through Markyate;
 - Providing improvements to the ambience of the High Street
 - Proving enhancement to the Conservation Area
 - Providing enhancement to the setting of the listed buildings
 - Improvements to the public realm
 - Improving air quality along the High Street
 - Improving congestion
 - Reducing traffic at Pickford Road junction which is sub- standard and dangerous;

- Provide vehicle access to the allotments and increase allotment numbers;
- Junction enhancements to south of village for improved access from London Road onto A5183; and
- Improved public accessibility to the Green Belt and AONB, with easy access to public footpaths.

1.34.8 The proposed parcels would add a further level of housing to Markyate; providing a mix of market and affordable housing for the growth of Markyate

1.34.9 The proposed parcels can accommodate additional public open space and community facilities located close to the centre of Markyate, where most residents will be able to access. This is seen as a significant improvement over the allocation of My-H1 only

1.34.10 Noting the Hicks Road development did not deliver the required GP surgery, and that DBC have sought to require this in future development of growth at Markyate; the proposed land parcels can provide a suitable location for the GP surgery, with good connections to the centre of Markyate. The allocation of the proposed land parcels for a mixed-use development provides the most suitable option of growth for Markyate. Providing facilities close to the centre of the settlement, providing a through road to the east of the settlement to avoid additional traffic to already restricted junctions within the settlement

1.34.11 The Green Belt designation of the site is noted; however, it is important to note the distinction that the Green Belt around Markyate is part of the Luton Green Belt area, as opposed to the rest of Dacorum that is Metropolitan Green Belt land. This is important in the context of Green Belt purposes; the Green Belt designation in the context of this site is to prevent coalescence from the expansion of Luton; therefore, it is questionable how the Green Belt extension in the 1991-2011 Local Plan to include the Site serves the intended purpose of the Green Belt to stop Luton sprawl. Furthermore, Dacorum is within a separate strategic housing market area from Luton, so again the connection with the expansion of Luton is not relevant, especially with regard to the Site located south west of Markyate on the opposing side of the settlement from Luton

1.34.12 With regard to the AONB designation, the site was previously entirely excluded from the AONB, but following an amendment to the AONB boundary in the 1980s, part of the site was brought within the designation. The site is at the very edge of the AONB designated area

1.34.13 An illustrative masterplan has been prepared to demonstrate how the proposals can provide a suitable growth option for Markyate; this is provided at Appendix 3 of this document

1.34.14 A more detailed Master Plan study has also been commissioned by the Landowners and this has been submitted with these representations.

1.34.15 With regards to constraints of the land parcels proposed; it is noted that the relationship with AONB

	<p>land is closer than with the other appraised sites. The masterplan approach has avoided built development in the AONB other than the road and potentially the GP surgery</p> <p>1.34.16 The design concept is to create a soft urban edge, to sensitively delineate between the settlement and the AONB. The settlement pattern of rounding the south-eastern quadrant of Markyate is more sustainable than creating further linear development to the settlement</p>
Include files	
Number	Question 46
ID	LPIO21439
Full Name	Paul Walsh
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 object to any green belt development in and around Kings Langley village. The village can only support another 50 or so houses.</p> <p>The proposed development is totally unsustainable in terms of the huge impact it would have on the village ethos and its surroundings. It will lose its character and charm.</p> <p>KL village has a medieval historic past and has developed slowly over the years to become a very desirable place to live.</p> <p>It's very close to the countryside, with many footpaths, some popular farms, in particular Wayside Dairy Farm where people come from far and wide to purchase their milk.</p> <p>It will destroy the village status, local wildlife and cause overcrowding of local amenities such as doctors surgeries, schools and emergency services.</p> <p>The village already has an industrial/commercial development around its outskirts, which causes traffic jams at times.</p> <p>The village has grown to such an extent that it is almost at bursting point especially during rush hour. Travel times to the Watford A&E hospital can already take up to an hour during rush hour.</p> <p>There is no scope for any future roads to support the potential huge increase of traffic.</p> <p>There is no detailed/extensive research into how its proposals would affect the existing infrastructure around the village.</p> <p>Heme! Hempstead and other surrounding towns are much more suitable to future expansion as they have a much better road and rail system in place.</p>

	<p>DBC should adhere to the Governments 'National Planning Policy, on Green Belt land, where it states that -</p> <ul style="list-style-type: none"> • Neighbouring towns should not merge with each other • Safeguarding the countryside from • Preserve setting and special character of historic towns and villages <p>However-</p> <p>DBC has recently started up a register of Brownfield land/sites (as required by a Government scheme). Its main purpose is to identify what sites that may be suitable for housing.</p> <p>They have asked anyone to put forward potential sites. The council will consider these for inclusion into their next Brownfield Land Register 2018 Coincidentally it starts from 13 December 2017, just after the DBC consultation ends.</p> <p>This is a very positive move as it could be a solution to the future needs of housing in DBC whilst protecting the countryside/green belt around KL village.</p> <p>Surely this is a better way of achieving Government targets and directives</p>
Include files	
Number	Question 46
ID	LPIO21456
Full Name	Majesticare Limited
Company / Organisation	Majesticare Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes Site Be-h8 Berkhamsted Golf Range</p> <p>[Please add comments below under q.46 and then attach response to cover points about the site.]</p> <p>44. We fully support the allocation of site Be-h8 in the new Local Plan and consider this to be an available, suitable and achievable location for the development of a high quality care home. Please consider this representation as feedback on the site Be-h8 and confirmation that the site can assist in delivering the options for growth and the strategy the Council is proposing within the new Local Plan (2036).</p>
Include files	Harriet Swale - Issues and Options Representations Shootersway final.pdf
Number	Question 46
ID	LPIO21472
Full Name	Audley Court Ltd
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	48. We fully support the allocation of site Be-h7 in the new Local Plan and the release of this site from the Green Belt. We consider this to be an available, suitable and achievable location for the development of a high quality Care Please consider this representation as feedback on the site Be-h7 and evidence that the site can assist in delivering the options for growth and the help the borough to achieve the aspirations the Council is proposing within the new Local Plan (2036).
Include files	Harriet Swale - Issues and Options Consultation Bank Mill Final.pdf
Number	Question 46
ID	LPIO21510
Full Name	Hightown Housing Association
Company / Organisation	Hightown Housing Association
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<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 note which accompanies it? Yes Site Bov-h1</p> <p>We support the application of Grange Farm, Bovingdon for release from the Green Belt and allocation for development.</p> <p>This site is deliverable and offers the opportunity to secure a site for the early delivery of much needed accommodation either for general housing or the provision of specialist accommodation for older persons. The site is in a good location within the village and the village is well equipped to provide the services to support the development. The development of this site will also offer a benefit to the economic sustainability of the village.</p> <p>We have already entered into informal dialogue with the Council on the opportunity this site offers and we encourage the proposed allocation of the site in the next stage of Local Plan consultation to enable its delivery.</p>
Include files	
Number	Question 46
ID	LPIO21524
Full Name	Mrs S. M Potter

Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Q.46 Sites Yes Tr-h1 Land north of Station Road</p> <p>Re DEVELOPMENT IN TRING - Tr-hi, <u>Natural Beauty</u></p> <p>I think that this site should be re-considered as potential housing because of its proximity to The Ridgeway Path and it is an area of natural outstanding beauty.</p> <p>Access</p> <p>If a road is constructed from Bulbourne to Station Road - What happens to the traffic then? Bullbeggars Lane is not suitable for more traffic and Cow Lane certainly is NOT.</p> <p>As a regular user of Cow Lane I have witnessed accidents quite frequently at either end of this Lane. If more houses are built towards The Station, this problem will NOT get any less.</p> <p>New roundabouts/road junctions/widening MUST be made in order to cope. The Lane, as it is, is far too narrow for heavy vehicles. Where do they go?</p> <p>Weekends along this road at present are a complete nightmare because cars connected to the Football and Rugby Pitches are parked on the road making passing very difficult.</p>
Include files	
Number	Question 46
ID	LPIO21525
Full Name	Mrs S. M Potter
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Q.46 Sites Yes Tr-h2 Land west of Marshcroft Lane <u>Tr-h2 & Tr-h3</u></p> <p>I have lived in Grove Road for over 40 years and have seen its transformation from a quite road into a "race-track".</p> <p>Something will have to be done to cope with extra traffic, again at the Station Road junction, but more specifically at the New Mill End.</p>
Include files	
Number	Question 46

ID	LPIO21526
Full Name	Mrs S. M Potter
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Q.46 Sites Yes Tr-h3 Land at Icknield Way / Grove Road <u>Tr-h2 & Tr-h3</u></p> <p>I have lived in Grove Road for over 40 years and have seen its transformation from a quite road into a "race-track".</p> <p>Something will have to be done to cope with extra traffic, again at the Station Road junction, but more specifically at the New Mill End.</p>
Include files	
Number	Question 46
ID	LPIO21527
Full Name	Mrs S. M Potter
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Q.46 Sites Yes Tring</p> <p>Finally, Tring has limited amenities, it will not be able to cope if hundreds more homes are built. The quantity must be reduced.</p> <p>Car Parking in the town centre is already fully utilised as are existing services.</p>
Include files	
Number	Question 46
ID	LPIO21573
Full Name	Mrs Valerie Silverton
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 read the proposals and strongly agree BRAG's responses.

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"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO21574
Full Name	Ms Sarah Davies
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 currently live on Hill Farm, one of the proposed Green Belt sites for many new homes. I feel incredibly strongly about saving Green Belt land, but of course, feel even more strongly the fact one of the proposed sites is where I live.</p> <p>The reason we moved to this location in Kings Langley, was because of the nature and wildlife, the unspoilt traditional small village, and never dreamt Green Belt land could be built on.</p> <p>I'll now list some points that immediately spring to mind:</p> <p>-</p> <p>1) Green Belt land is so important, to protect the land to provide habitat to wildlife. Natural environments need to be protected, this improves air quality, it ensures residents have access to countryside, it also protects the unique character of Kings Langley, which otherwise</p>

would be absorbed by an expanding community, which I don't believe it could cope with.

2) Green belt has so many benefits for this community, it gives us cleaner air and water ultimately, it provides habitat for so much of the wonderful wildlife we have living here, such as deer, rabbits, many varieties of birds, foxes, bats and muntjacs to name a few, also wild plants.

3) Kings Langley High Street is already a narrow road, this morning it took us 30 mins to get from our home on Love Lane to the roundabout in Kings Langley for the M25, I can't imagine the village being able to cope with any more traffic! I'm sure that many of the buildings on the High Street are Listed, and I don't know how this road could be made wider? Especially if more emergency vehicles had to get into and out of the village, it is a big concern. Langley Hill, Vicarage Lane and Common Lane, which all lead to the High Street from Love Lane, are already at breaking point, the wait, especially in busy periods is already crazy at times.

4) We also have goats at Hill Farm, who graze on the land here, they would lose their home, as well as all the other wildlife which I already mentioned.

5) The proposed site at Hill Farm is also next door to the already busy secondary and Primary Schools, buses and cars already struggle to cope with these narrow roads, and the weight of traffic on Love Lane would just get worse.

6) I feel strongly that Brownfield Sites should be used first to protect our environment and the character of this little village. There are apparently many vacant homes already in the area which I believe should be used first which would mean voting for plan **1A**.

7) Living on Hill Farm, the refuse collection already takes up the width of the driveway once a week for a short time to collect the refuse, this is without pavements, other vehicle cannot pass by whilst they are collecting for the 4 homes here. If there were more homes built in this location, it would be incredibly dangerous in an emergency, especially if it was a fire engine or ambulance! This is a huge worry, and I'm not sure it would be legal? Most families these days also own 2 cars, I just don't see how this is a legal/safe option for so many people. Two Vehicles not being able to pass by, and no pavements for residents, due to the narrow width of the driveway?

8) It would completely change the character of this traditional village, and it would end up as part of Hemel Hempstead town. Any peace and quiet would be lost.

9) Doctors surgery's and all the local secondary and primary schools are already at full capacity; how could Kings Langley accommodate so many more residents?

10) By building concrete on vast areas of Green Belt land, there would be a huge drainage problem, as the soil helps to absorb rain water. If we built on this Green Belt land, flooding would occur.

11) I spent a lot of money when purchasing my home 7 years ago. The reason I chose this location is because of the beautiful landscapes, wildlife, animals and the

	<p>quiet, traditional village life, which has already got busier over the years.</p> <p>12) From 8:15 to 9:00 and 15:15 to 16:00, Love Lane is horrendous to drive through, due to parents picking and dropping off their children, to and from Kings Langley Secondary School, and the primary school on Common Lane and Love Lane. By adding new houses on Hill Farm, the roads would be even more chaotic.</p> <p>I feel passionately about saving our village, the Green Belt land, the wildlife and nature of Kings Langley, I will be voting on the 14th December. I hope my points of concern will be considered, many of the residents in Kings Langley feel incredibly passionate about our village being completely ruined, and overloaded.</p>
Include files	
Number	Question 46
ID	LPIO21575
Full Name	Ms Sarah Davies
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 currently live on Hill Farm, one of the proposed Green Belt sites for many new homes. I feel incredibly strongly about saving Green Belt land, but of course, feel even more strongly the fact one of the proposed sites is where I live.</p> <p>The reason we moved to this location in Kings Langley, was because of the nature and wildlife, the unspoilt traditional small village, and never dreamt Green Belt land could be built on.</p> <p>I'll now list some points that immediately spring to mind:</p> <p>-</p> <p>1) Green Belt land is so important, to protect the land to provide habitat to wildlife. Natural environments need to be protected, this improves air quality, it ensures residents have access to countryside, it also protects the unique character of Kings Langley, which otherwise would be absorbed by an expanding community, which I don't believe it could cope with.</p> <p>2) Green belt has so many benefits for this community, it gives us cleaner air and water ultimately, it provides habitat for so much of the wonderful wildlife we have living here, such as deer, rabbits, many varieties of birds, foxes, bats and muntjacs to name a few, also wild plants.</p> <p>3) Kings Langley High Street is already a narrow road, this morning it took us 30 mins to get from our home on Love Lane to the roundabout in Kings Langley for the M25, I can't imagine the village being able to cope with any more traffic! I'm sure that many of the buildings on the High Street are Listed, and I don't know how this road could be made wider? Especially if more emergency</p>

vehicles had to get into and out of the village, it is a big concern. Langley Hill, Vicarage Lane and Common Lane, which all lead to the High Street from Love Lane, are already at breaking point, the wait, especially in busy periods is already crazy at times.

4) We also have goats at Hill Farm, who graze on the land here, they would lose their home, as well as all the other wildlife which I already mentioned.

5) The proposed site at Hill Farm is also next door to the already busy secondary and Primary Schools, buses and cars already struggle to cope with these narrow roads, and the weight of traffic on Love Lane would just get worse.

6) I feel strongly that Brownfield Sites should be used first to protect our environment and the character of this little village. There are apparently many vacant homes already in the area which I believe should be used first which would mean voting for plan **1A**.

7) Living on Hill Farm, the refuse collection already takes up the width of the driveway once a week for a short time to collect the refuse, this is without pavements, other vehicle cannot pass by whilst they are collecting for the 4 homes here. If there were more homes built in this location, it would be incredibly dangerous in an emergency, especially if it was a fire engine or ambulance! This is a huge worry, and I'm not sure it would be legal? Most families these days also own 2 cars, I just don't see how this is a legal/safe option for so many people. Two Vehicles not being able to pass by, and no pavements for residents, due to the narrow width of the driveway?

8) It would completely change the character of this traditional village, and it would end up as part of Hemel Hempstead town. Any peace and quiet would be lost.

9) Doctors surgery's and all the local secondary and primary schools are already at full capacity; how could Kings Langley accommodate so many more residents?

10) By building concrete on vast areas of Green Belt land, there would be a huge drainage problem, as the soil helps to absorb rain water. If we built on this Green Belt land, flooding would occur.

11) I spent a lot of money when purchasing my home 7 years ago. The reason I chose this location is because of the beautiful landscapes, wildlife, animals and the quiet, traditional village life, which has already got busier over the years.

12) From 8:15 to 9:00 and 15:15 to 16:00, Love Lane is horrendous to drive through, due to parents picking and dropping off their children, to and from Kings Langley Secondary School, and the primary school on Common Lane and Love Lane. By adding new houses on Hill Farm, the roads would be even more chaotic.

I feel passionately about saving our village, the Green Belt land, the wildlife and nature of Kings Langley, I will be voting on the 14Th December. I hope my points of concern will be considered, many of the residents in Kings Langley feel incredibly passionate about our village being completely ruined, and overloaded.

Include files	
Number	Question 46
ID	LPIO21583
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p>Summary Section from GFRA – Executive summary</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>GFRA full document attached</p>
Include files	GFRA response - Issues and Options Response - On Behalf of the GFRA.pdf
Number	Question 46
ID	LPIO21630
Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p>GFRA Response to Question 46, full document attached to question 46</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>" (East Hemel Hempstead) 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	LPIO21634

Full Name	Mr Charlie and Claire Laing
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My name is Charlie Laing and I am a resident of Tring and a member of the Grove Field Residence Association. I am writing to you on behalf of my wife and I to raise our concerns over some of the options proposed in Dacorum's New Single Local Plan (to 2036).</p> <p>I enclose a copy of a report that a planning consultant submitted to Dacorum on behalf of the Grove Fields Residents Association on Monday 11th December, of which I fully support. After the last town hall meeting, it is clear this report is very closely aligned with the views of Tring Town Council.</p> <p><u>General concerns</u></p> <p>There are currently plans in place to build an additional 500 houses, it is difficult to see how the existing infrastructure can support these, let alone an additional 1000 – 2667. Some of our specific infrastructure concerns are:</p> <ul style="list-style-type: none"> • Schools – many of the schools are at capacity and some children already do not get in to their local schools. • Roads – the roads through the centre of town and access to Tring station are often already heavily used and we experience congestion. • Parking – the current car parks in Tring centre and at the station are not sufficient for the capacity of cars requiring parking today. • Hospitals – the current hospital options from Tring struggle to deal with the demand on them. • Nursing homes – there is a shortage of nursing home options at the moment. <p>These significant infrastructure concerns point to underlying challenges in any significant growth to Tring and need to be seriously considered and improvement plans in place ahead of any development agreements.</p> <p>Based on the current size of Tring, the significance of the proposed development plans are not proportionate to the existing size of the town, and we believe it would fundamentally change the town, for the worse. One of the fantastic things about Tring that you will hear people cite time and time again is the community – this will be impossible to maintain if the town experiences growth in numbers and the geographic spread of the town.</p> <p>It would destroy the identity of rural market town on the edge of the Chilterns Area of Outstanding Natural Beauty</p>

and turn it into an urban neighbourhood. Many people, like ourselves move to Tring from London and we feel that significant development to the town would destroy many of the reasons we chose to move to this community neighbourhood.

Specific concerns over sites Tr-h2 and Tr-h1

Development on these 2 sites will have a major adverse impact on nature and wildlife. These areas contain mature hedgerows and trees and are a natural habitat for many species of wildlife and flora and fauna. It is also the site of active agriculture which should be protected.

Due to its quality of countryside, beauty and tranquillity, the area is used for a wide number of recreation activities for families, cyclists, runners, horse riders and dog walkers who all regularly use it throughout the day and the weekends.

Marshcroft lane cannot take the additional load from the cars that would need access to Tr-h2 and additional traffic down Marshcroft lane will have a notable negative impact on these recreational activities and likely pose a safety concern.

In summary

I see no advantage in extensive development in rural market towns over the option of further development in existing urban towns such as Hemel Hempstead, which already have the infrastructure and are designed for this purpose, other than the advantage for the developers in higher yields. I also do not understand why new settlements are not a higher consideration rather than completely changing the identity and communities of existing rural market towns.

We do understand the need for additional housing across the UK and Dacorum needs to play its part, however, based on the evidence and our concerns outlined in this email and attachments, it seems to make far greater sense to consider the following first.

- 1 Proposals to build in Hemel Hempstead, given the nature of the town and the existing infrastructure

If further development above the existing commitment of 500 was completely unavoidable then;

- 1 Tr-h5 – Dunsley Farm site. The location is close to the town which will help maintain a town's community and will encourage access to the town centre without the use of a car which will reduce pressure on the roads, carparks and air quality. The site also provides options for additional

facilities such as a business park and recreational facilities.

If there is to be further development in Tring we believe the following in particular needs to be addressed:

- Clearer definition of 'affordable housing' and real understanding of what housing is needed in Tring
- Need to attract business and let entrepreneurs thrive in the area and therefore the need to build a business park
- Open spaces and sports facilities – maintaining and increasing in line with growth plans

If further development above the existing commitment of 500 was completely unavoidable then;

1. Tr-h5 – Dunsley Farm site. The location is close to the town which will help maintain a towns community and will encourage access to the town centre without the use of a car which will reduce pressure on the roads, carparks and air quality. The site also provides options for additional facilities such as a business park and recreational facilities.

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.²¹ 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 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	LPIO21636
Full Name	Lindsey Simpson
Company / Organisation	
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Many of us concerned about planning in Dacorum have answered these types of questions many times before at face to face meetings and online. How many times do you need us to tell you the issues and our concerns? This is especially frustrating when we feel our concerns are not listened to and buildings like the Beacon get the go ahead.</p> <p>You will see below a copy of an email I sent to Briony Curtain which outlines two of my main concerns – high rise development and the impact of increased traffic and pollution in Boxmoor. You will also see attached the results of an online community survey which I undertook in November 2016 to understand local views on planning issues. 222 people responded in 48 hours – an indication of people’s interest and concern in these matters. I submitted the survey results to DBC to help inform the debate as part of the November 2016 planning consultations. I attach it to this email too for your information. The questions were balanced and quantative.</p> <p>DEVELOPMENT HEIGHT</p> <ul style="list-style-type: none"> The poll showed that 90% of respondents want developments of FOUR storeys or less, with only 10% wanting buildings over four storeys. Only 1.8% of residents (4 people) found 15+ storeys acceptable. <p>CONGESTION IN BOXMOOR/TWO WATERS</p> <ul style="list-style-type: none"> 81% of residents already experience congestion and delays by London Road/Aldi junction during the weekday rush hour and 71% experience congestion causing delays at the weekend. This is particularly true for people wanting to travel into Apsley on the weekends. It can easily take 40 minutes to get from Hemel station to Sainsbury’s in Apsley – less than a couple of miles. The Beacon traffic could well completely gridlock the area meaning people will struggle to access Apsley, the M25, the station and the town – problematic for business, employers, commuters, schoolchildren and the environment. <p>Development on St John’s Road and in LA3 will bring much greater traffic and air pollution to an already congested area. I have not seen any realistic traffic impact assessment that identifies and acknowledges this. With current developments in the pipeline it is likely that Fishery Lane and St John’s road will be at a standstill in the rush hours and weekends.</p> <p>I note in the documents I have read in the Local Plan the aspiration to ‘try’ to develop in a way that minimises the impact on the environment. This amounts to no commitment at all. The people of Hemel want to see action against high density developments that are out of keeping with the local character, threaten the beauty and wellbeing of the moor and will bring even heavier</p>

	traffic and increased pollution to Boxmoor and its feeder areas.
Include files	Lindsey Nash - Two Waters community feedback 222 responses.pdf
Number	Question 46
ID	LPIO21651
Full Name	Silversaw Ltd
Company / Organisation	Silversaw Ltd
Position	
Agent Name	Mark Novelle
Company / Organisation	CBRE
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We act on behalf of Silversaw who are the owners of Site KL-h1 (Land at rear of Hill Farm, Love Lane) and we welcome the inclusion of the site within Section 10.8 'Key Site Options'. We understand at this stage that there have been no recommendations put forward for site release and we would therefore like to take this opportunity to wholly support the release of this site from the Green Belt as a sustainable, deliverable and available site for housing delivery within the early stages of the plan period. Further to this, the evidence base developed to date supports the release of this site as it is considered to perform weakly against the purposes of Green Belt and as such provides an opportunity to sensitively extend Kings Langley to contribute to meeting the housing needs in DBC.</p> <p>Green Belt Studies</p> <p>Site KL-h1 is located in the north-west of the large village of Kings Langley and has been promoted by Silversaw for development as it is considered to be a site which is suitable natural extension to Kings Langley and which is available for the delivery of housing through sensitive release, which, as stated in the evidence base would not undermine the primary functions of the Green Belt in this location. The site is currently Grade 3 agricultural land (Natural England, 2011).</p> <p>The site (KL-h1) has been the subject of detailed assessment through the Green Belt Stage 1 and Stage 2 Review. The Stage 1 Green Belt assessment identified the site within a large parcel (GB14B) of Green Belt land between Hemel Hempstead and Kings Langley. The study identified that this larger parcel contributed significantly to two out of the five Green Belt purposes (preserving the setting and special character of historic towns and to maintain the existing settlement pattern). However, the study concluded that a smaller area identified as D-S3 should be assessed further. D-S3 was inclusive of KL-h1, with the study concluding that the reduction in the size of the Green Belt in this location would not significantly compromise the primary functions of the Green Belt.</p>

The Stage 2 Assessment which reviewed the D-S3 sub-area concluded that the sub-area meets the Green Belt purposes weakly and is subject to a number of non-absolute constraints, with the recommendation being to take the site forward for further assessment. This parcel was then further divided with land at rear of Hill Farm, being identified as parcel KL-A3. The study identifies that the parcel is one of the weakest sites, with an overall score of 3 out of a possible 20 against the Green Belt Purposes Assessment, being one of the eight 'weakest contributing sites' out of a total of 57 sites examined.

The parcel identified as KL-A3 is an area wider than Silversaw's ownership, and the identified, non-absolute constraint (Conservation Area) is not applicable to the land in Silversaw's ownership. Further to this, the site does not impact and is not located within the Chilterns Area of Outstanding Natural Beauty and was therefore considered a good site to take forward to the next stage of assessment.

The landscape and boundary assessment of the site identified that the sensitivity of the parcel to residential development is judged to be moderate-to-low and there are clear historic field boundaries, which could be adopted and strengthened to form a new Green Belt boundary to the north-west of Kings Langley, this is apparent in the parcel put forward within the issues and options KL-h1 which is a smaller defensible plot.

Overall, of the five sites surrounding Kings Langley assessed at the Stage 2 Level, three were considered for further assessment, given their status and contribution to Green Belt purposes. Sites KL-A3 and KL-A1a are two of the sites put forward within the Green Belt Stage 2 assessment, however the final and largest site for consideration within this Issues and Options Assessment (KL-h3 - Land to the east of A41 and Wayside Farm, Watford Road) was excluded at Stage 2 for further assessment given its high sensitivity in terms of landscaping, visual prominence, openness, level of indivisibility and long views. It was concluded that this would not be suitable for Green Belt Release.

KL-h1 Site Considerations

Following a review of the site we consider that it would provide a sustainable, accessible option for the delivery of housing within Kings Langley, which would contribute to the overall delivery of housing within DBC. The site forms a natural extension to Kings Langley, and the review of the site boundaries identifies that a number of historic field boundaries could be adopted and strengthened to form a new Green Belt boundary to the north-west of Kings Langley. The development of the site would ensure that the purposes of Green Belt, in the wider context of the parcel, were retained.

The Schedule of Site Appraisals Sustainability Appraisal Working Note (2017) confirms our view that the site performs well, creating positive impacts against seven of the 15 identified criterion, with no predicted effects being identified for a further three. The impacts assessed as having potential for a negative impact include Biodiversity, Soils and Landscape given that the site is

	<p>greenfield land close to the Chilterns Area of Outstanding Natural Beauty (AONB). It is acknowledged that these elements require further research and assessment, to conclude their impacts.</p> <p>The site is located on a plateau and as such the prominence of the development in visual terms would be limited with a strong boundary treatment, which would serve to reduce the visual impact and to create a defensible boundary to the Green Belt as required by the NPPF. The nature of KI-h1 and the existing developments which surround it provide further defensible boundaries, which would ensure that development would not extend into the countryside further than the existing developments.</p> <p>The site is located to the north-west of the local centre of Kings Langley, within walking distance of a primary and secondary school, the local centre and the services that this provides. Further to this, the site is immediately adjacent to the Kings Langley School and this co-location provides opportunities for collaboration and connectivity, thus increasing and retaining the sustainability of the site.</p> <p>Given that Kings Langley has been identified as a location where growth could take place to support the delivery of housing, we support that this is the most appropriate Green Belt site for release, taking into consideration the current evidence base and reviews of the site.</p>
Include files	
Number	Question 46
ID	LPIO21652
Full Name	Mr Philip Stokes
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 frankly appalled that such a proposal is even being considered. The farm and its environs are an immense asset both to Kings Langley village and the surrounding area in so many ways, that I can see no possible advantage in development of the land.</p> <p>My objections are summarised as follows:</p> <p>The farm is within the green belt and there should be a presumption against any development of the green belt, particularly in an area such as south-west Hertfordshire where over-development is already an issue and the existing infrastructure is insufficient to cope with the current population, transport and traffic flows, hospital facilities etc.</p> <p>The land on which the farm is situated provides a natural barrier to further over-development within the village area, as long as it is retained in its current form.</p>

Development of the land at Wayside Farm will not only be detrimental to the village environment as it currently stands, but once a decision has been made to build into the green belt there will be little incentive to prevent further development in the future. It may also prompt additional development in adjacent local council areas thus hastening the loss of countryside in an area where it is already a decreasing and valuable commodity both for the environment and the existing population.

I fail to see how Kings Langley village would be able to cope with additional population and traffic at a level which the scale of the proposed development would indicate. It is already difficult to exit the village to the south during peak traffic times, particularly with the volume of traffic travelling along the A4251 (which not only originates from within the village but also includes a high volume of traffic travelling through the village from Hemel Hempstead and other areas to the north, either through convenience or in attempts to avoid the queues on the A41 trunk road approaching Junction 20 of the M25). I cannot see any way in which the problem of additional traffic could be managed or alleviated. It either has to enter the A4251 or directly onto the A41 from any new development. In either case there would be safety issues to consider and additional delays to the already heavy traffic flows.

It is my understanding that a number of smaller planning applications along the A4251 Watford Road have successfully been denied in recent years due to concerns over additional traffic entering and exiting from the A4251, with resulting concerns over the safety of current and additional road users. If there are legitimate concerns over the traffic generated by development on a much smaller scale, how can the building of several hundred homes in the same area even be contemplated?

What will be next if this development is allowed? Will the increased pressure on the local infrastructure necessitate further development such as a redesign and re-alignment of the M25 junction to cope with additional traffic? How much more green belt land will have to be swallowed up to enable this? Will such development encourage even more over-development within the local area, either within the village itself or along the A41 corridor?

In my opinion south-west Hertfordshire is already over-developed and further development along the lines indicated will surely result in the whole area becoming swallowed up as a concreted over suburb of Greater London sooner or later. It is my opinion that this is a consequence that should be avoided at all costs, and whilst I realise that there is a pressure for further homes to be built within the local area, I believe that these should wherever possible be concentrated on existing brownfield sites or adjacent to existing larger urban areas. If it is felt necessary to grab rural land then surely there is much more of it in other parts of Hertfordshire that could be assessed without having such an effect on the local environment and existing communities as would be the case in south-west Hertfordshire.

Turning to Wayside Farm itself, I consider it to be a valuable resource for the local community in its current form. The land is a welcome oasis of respite from the surrounding urbanised environment, and I personally use it daily by walking the footpaths within its boundaries. It provides a much needed relief from the pressures of modern life, allowing me to recharge my batteries and gather my thoughts whilst enjoying the landscape. I see many other regular users of the land who obtain similar enjoyment from it, and I also know that the tenant farmer Mr Charlie Wray welcomes and encourages such use. Also, it is more than fair to say that Mr Wray is a great asset to the local community. He engages with the local community on numerous levels, not only encouraging recreational use of the rights of way across the land as already mentioned, but also in welcoming and facilitating educational visits to the farm, both I believe by families and school children. He has been proactive in utilising the farm to the benefit of the community, not least by introducing a supply of raw milk from his herd which is valued not only by the local community, but also customers who travel to the farm from further afield.

I understand that Wayside Farm is also one of only two Jersey cow herds remaining in the whole of Hertfordshire, and on that basis alone I cannot see how any change of use of the land can even be envisaged. Such a scarce resource such be nurtured and encouraged, not concreted over. Once lost, it will never return. We are being told that the UK will need to become more self-sustaining after Brexit, and that we will need as a country to grow and provide more of our own food. On this basis alone, any consideration of the removal of an agricultural resource from an area where they are already a rarity seem to me to be utter madness.

On a personal level, the loss of such a valuable amenity (which I utilise and treasure on a daily basis) would prompt me to make more car journeys to reach other areas of surrounding countryside where I can escape from the built-up environment to obtain small moments of peace and quiet, and enjoy the rural environment. This would obviously increase traffic and pollution, albeit to a very small level, but I am sure that I am not alone in contemplating such a measure which I would consider a necessity for my personal health and wellbeing.

I note that the proposal for development of Wayside Farm includes “improvements” to the existing footpath network. I’m afraid that I totally fail to see any way in which the existing network could be improved. If, as I suspect, it means that the paths would be paved over and hemmed in by buildings or fences, than that is certainly not an improvement in any form that I can envisage.

Please do not think that I am a “nimby”, totally averse to any further development in the local area, as I am most certainly not. I do however believe that any further development within the village environment should be considered in relation to, and focused on its advantage to the local community, and not solely as a method of reaching a target for the surrounding area or to avoid building elsewhere. To that end, I strongly believe that any further development within the village should focus

on the retention of younger residents in the community, both in the form of affordable housing for local people and accommodation for older residents that might free up existing housing stock for families. The locations for any such developments should however be considered with sensitivity to the village environment, and I do not believe that the community is in any way served by blanket development of green belt land, which needs to be retained intact both to prevent runaway development across the area and to preserve the amenity for the enjoyment of future generations. Development on such a scale as envisaged for Wayside Farm would also permanently and adversely change the character of a historic Hertfordshire village that has been largely successful in retaining its village atmosphere until now.

Finally Mr Wood, I know that you have been in your current position since 2012, but I do not know how long you have had involvement with the local area prior to that. It may be that you have no knowledge or memory of the construction of the A41 bypass which now runs along the western boundary of Wayside Farm. You may therefore not be aware that the alterations to the land levels resulting from the construction caused a landslip in which hundreds of tonnes of mud were brought down the hill by rainfall into the homes along Watford Road at the lower edge of the slope. It is my understanding that this occurred primarily due to the nature of soils within the area. As this was apparently not discovered until after the event, despite presumably extensive investigations by the developers before the excavation and construction of the road, can there be any cast-iron guarantee that such an event would not happen again, either to the detriment of the existing residents or to any new development sited on that area?

In conclusion, it is my opinion that there are absolutely no points in favour of the development of any of the land currently comprising Wayside Farm, and that any such development would be catastrophically detrimental to the current residents and environment not only of Kings Langley itself, but also the surrounding area.

I would urge you to reach a decision that Wayside Farm should not be sold or made available either now or in the foreseeable future for any form of residential or commercial development, and I sincerely hope that you will take my observations into consideration in reaching your decision.

Include files	
Number	Question 46
ID	LPIO21654
Full Name	Mrs Melanie and Peter Domb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

I know that you will have had many emails on the subject of development of the Green Belt sites in and around Kings Langley.

I have only lived in KL since 1997 when I moved into a fairly quiet, sleepy village.

I moved into a house called The Old Red Lion in Waterside which was built in 1525.

During the course of my 9 year ownership of that house, the development at Apsley Lock was built. This was followed by the Development of the Ovaltine Factory. The small road (Waterside) has had to bear the brunt of all the extra traffic generated by these, and other, small developments in the area. The traffic driving up Waterside caused structural damage to the Grade II listed building we lived in and we had to put up extra supports to stop the ceiling falling down. This was nothing to do with the structure of the house, but more to do with the vibration caused by all the cars.

Eventually, we moved out of Waterside as it was becoming a rat run of traffic coming from the other side of the canal. We moved to Common Lane in 2006.

A couple of years later, the Royal Mail sorting office was closed and the building was pulled down to make way for the new Care Home with 40 beds and inadequate parking spaces which will be finished in 2019. This will result in more cars being parked on the High Street as the car park in Langley Hill is always full by 9am. Without a sorting office, all the residents of Kings Langley have to collect their parcels (as most of them are at work) from the small Post Office on the corner of Common Lane. There are two laybys for parking. One (in the High Street) has 4 car spaces and 2 disabled spaces. The one in Common Lane has 3-4 spaces and is restricted between 1 and 1.30 so people can't pick their parcels up in their lunch break. Cars are frequently parked on the yellow line or left totally blocking the pavement by the Fire Station. There is no pavement on the other side. This frequently causes chaos, especially during the school pick up time when cars coming down Common Lane to the High Street can't get past the parked cars on the left. This is dangerous for the children leaving school and makes it very difficult for cars trying to drive in the opposite direction. Nothing has been done to alleviate the problem.

Furthermore, planning permission is about to be granted for another 40 retirement homes in Kings Langley Village despite huge opposition from the local residents. This will not only ruin the views of the cottages in the conservation area behind the current 4 houses but, again, is not providing enough parking. The developers McCarthy and Stone, have hoodwinked the Council into believing that retirees don't have cars, nor do they have visitors or carers. They have cited that there is 'ample parking' on the Hempstead Road. There is not. This will cause more traffic chaos.

Added to that are the 280 homes which are to be built in Frogmore Lane. This is a brownfield site and quite the right place to put residential homes. HOWEVER: access from Frogmore Lane is onto Durrants Hill Lane which is frequently gridlocked as it has a single track bridge over

	<p>the canal. The A4251 which pass through Apsley and into Kings Langley backs up to Red Lion Lane where the recent development at Nash Mills (again with not enough parking spaces) has caused the residents to park on the pavement, sometimes completely blocking the road where the island sites are. Adding a large amount of housing on the SHENDISH MANOR site would not only cause more misery to those who already have to drive in this area but would also cause an enormous amount of disruption during the years of building. The A4251 CANNOT be improved to take all the extra traffic that would be generated if this development were to be allowed. It would also cause the coalescence of Kings Langley, Apsley and Hemel Hempstead as, despite it's HP postcode, it is, essentially, in Kings Langley.</p> <p>More homes were recently built in Apsley High Street. The addition of a new GP surgery and pharmacy were included. This is the ONLY addition to the infrastructure that has been created.</p> <p>Kings Langley is a small village. We want it to remain a village with the essence of a village. You cannot build hundreds, let alone thousands, of houses and offices on Green Belt sites and expect to protect the things that are valued about our villages and the surrounding countryside.</p> <p>I understand the need for housing. But the Council needs to understand the need to preserve our village as a village and not turn it into a Town. We do not have the facilities to support hundreds of new homes in our village. We need to preserve the character of our village and allow its green spaces to continue to provide pleasure and space for wildlife for the foreseeable future.</p>
Include files	
Number	Question 46
ID	LPIO21655
Full Name	Mrs Melanie and Peter Domb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>WAYSIDE FARM, for example, is one of only two dairy farms left in Hertfordshire. It is an integral part of Kings Langley village life. People who grew up in this village, have been walking the fields all their lives.</p> <p>We can buy raw Jersey Milk there and the farmer has now set up a wonderful farm shop for local people and those who live further afield are now coming to buy from him. Children are able to see what a working farm looks like and to see where their milk actually comes from. This is such a huge educational asset and the idea of taking that away and building more faceless houses and office on this site is anathema to us all. Added to this is</p>

	the loss of valuable wildlife habitat in the fields, the recently planted woods and hedgerow that would all be lost if development was allowed to take place.
Include files	
Number	Question 46
ID	LPIO21656
Full Name	Mrs Melanie and Peter Domb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	HILL FARM is also a valuable Green Belt asset. Another area with limited infrastructure and small roads that can't support any more traffic. This is a landlocked area of green belt with valuable wildlife habitat that must not be allowed to be used for development. The part of Hill farm that was developed a few years ago is enough.
Include files	
Number	Question 46
ID	LPIO21657
Full Name	Mrs Melanie and Peter Domb
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Finally RECTORY FARM. I would support small scale development of Rectory Farm using the footprint of the existing buildings, which are an eyesore and two of the units have been badly damaged by fire, the most recent on Saturday night. I believe the existing development of Toveys Mill could be extended along the canal bank to provide another 10-15 good quality houses. A further 25 or so houses starter homes could be provided on the existing footprint.. I also believe that a small shopping centre could be provided here with adequate parking and could provide a site for a new, larger Post Office and, perhaps, a small local supermarket and a coffee shop.
Include files	
Number	Question 46
ID	LPIO21664
Full Name	Hannah Pattinson
Company / Organisation	Linden Homes

Position	Strategic Land Regional Director
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Linden Homes Strategic Land is in the process of securing an option agreement on land East of Pea Lane, Berkhamsted (identified at Appendix 1 to this letter). The site is considered to have excellent, medium and long term potential as it relates well to the existing settlement and is considered to have a minimal effect on the existing community. The site has been promoted previously and is currently referenced in the SHLAA (2016) as “site N/1”.</p> <p>Housing targets</p> <p>In the Government’s consultation on <i>Planning for the Right Homes in the Right Places</i>, the standardised housing targets for Dacorum appear to show a decrease from what is in the previous SHMA i.e. from 756 to 602, however, as recognised in the Issues and Options document this figure is lower because the Core Strategy is currently less than 5 years old and a 40% increase on the current housing target of 430 homes a year creates a much-reduced and constrained target (602).</p> <p>Whilst it may not be popular, the Local Plan should make the difficult decision and seek to accommodate a level of need which is at least the targets identified in the SHMA and should realistically be planning for the figures that are generated by the new methodology. The Issues and Options document identifies that if the proposed formula for authorities with older plans is used, the housing figure rises to around 1,000-1,100 homes a year. This is a true reflection of need. The cap of 40% identified in the Government consultation is regarded as an arbitrary figure and the difficult decision should be taken now to accommodate the right level of need going forward as not doing so will simply increase demand and restrict supply in the future, worsening the existing problem.</p> <p>District Capacity and Strategy</p> <p>The Issues and Options Local Plan identifies potential for 11,000 houses on sites that meet current policy (i.e. not greenfield, Green Belt locations). This is considered to be optimistic based on the identified sources of supply. The need for a balance between housing and jobs is an important consideration for sustainable development and the redevelopment of employment land should not just be used without proper consideration of the impacts on the economy. Reliance on brownfield land also creates potential for delay based on issues such as contamination and land assembly problems which impact on deliverability. A greater proportion of greenfield development is necessary to ensure housing targets are delivered over the plan period.</p> <p>Green Belt Review</p>

Part I

The Green Belt Review Part I introduces an additional Green Belt purpose titled “maintaining existing settlement pattern”. This was recently criticised at the Welwyn Hatfield Local Plan Examination in Public. The Green Belt Review also covers the St Albans area which has had a Plan found unsound using the Green Belt Review as part of its evidence base. The Green Belt Review should concentrate on the five purposes as identified in national policy. Any use of the additional purpose in the selection of sites is considered to be unjustified and unsound.

The site at Pea Lane, Berkhamsted is located in “Parcel 06”, which the Green Belt Review identifies as making a “significant” contribution to the historic setting of Berkhamsted, however, this parcel does not make any contribution to the historic part of Berkhamsted at all. It adjoins Northchurch which is a much more modern development. This is an error in the Green Belt methodology. Just because a parcel adjoins what is deemed to be a “historic” settlement, does not ultimately mean it makes a contribution to its setting. A more detailed and refined assessment is required to justify this conclusion. The way the parcel interacts with the historic setting is an integral part of any assessment. There needs to be a connection between the land and the historic element of the settlement otherwise it bears not significance to the criterion. Simply adjoining a modern part of a historic town is considered too crude and not justified. That prevents any development adjoining a historic town ever being possible for potential development, which is not the intention of the policy.

Additionally, if this site is looked at in isolation it adjoins only 80 and 90s culs de sacs, which again makes no contribution to the historic part of Berkhamsted. There are clearly two issues here; one is a problem in relation to the scoring of the parcels and the other is that there is no site-level assessment and so no fine-grain judgement is made at a site level. The site is categorised by the larger-scale, strategic parcel assessment and in this case it is judged on the one significant contribution and as such not identified as being a potential location to release. This finer grain assessment is necessary, specifically around the settlements as there will be areas that do not meet the 5 tests of Green Belt purposes (as is the case here), however, because they sit within larger parcels they are not necessarily identified. This represents a missed opportunity and one that is considered to be a key flaw in the Green Belt Review.

There is also a consistency error in relation to the Green Belt Review as part of Parcel 11 (to the south of Berkhamsted) is identified for potential release even though it makes a significant contribution to two of the purposes of Green Belt. Parcel 06 in the report is identified as only contributing to one of the purposes (and this is disputed as set out above) and yet it is maintained in its entirety? There does not appear to be

sufficient explanation to warrant these conclusions and on the face of it appears to be an error and a decision which is not justified.

Part II

A Part II Green Belt Review has been undertaken to try to remedy the issues in the Part I document and as such does undertake a more refined parcel-level assessment. This confirms the point that the smaller scale parcel within which the site at Pea Lane is located (BK-A13) makes no significant contribution to Green Belt purposes.

Whilst this Part II assessment is useful in the context of assessing smaller parcels it goes on to combine landscape and other planning constraints, which is not the purpose of the Green Belt Review. This confuses the issue, to the point where it is making judgements about sites, when realistically the Green Belt Review should be a tool for decision making purely based on Green Belt issues, rather than making decisions itself and taking into account other planning issues. Making judgements about the SAMs, Flood Risk, AONB...etc is not appropriate here. These constraints should not contribute to a Green Belt Review and certainly shouldn't influence how sites are assessed as they are not Green Belt issues.

It should also be noted that the scoring for parcel BK-A13 is not correct in this Part II document. It identifies a score of "3" for the Towns Merging criteria, however, this site will not cause any merging issues as there are no settlements nearby. Also for sites BK- A11, BK-A12 and BK-A13 the Part II Review scores the issue of Sprawl a "3", however it is clear that the A414 provides a much more sensible, defensible boundary in this location. If these two criteria are correctly scored with a "1" or a "2" then this whole area south west of Berkhamsted is classified as having a limited contribution to Green Belt purposes in the scoring system and so would warrant further consideration for potential release.

SHLAA and AONB

The site at Pea Lane was not identified as "suitable" in the SHLAA based on the following conclusion "*The site falls within the Green Belt. The land may be suitable for future development subject to the outcome of the DBC Green Belt Review and other technical work under their Single Local Plan. However, account also needs to be taken of the site's location within the AONB in landscape of national and local significance. Site is unsuitable as its size would lead to major development (of over 10 units) in the AONB.*"

The NPPF states in Paragraph 116 that "*Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest*" (our emphasis). Clearly this

is not a development management decision and so the local plan provides the opportunity to justify both the exceptional circumstances and the public interest tests. The same requirement applies to Green Belt; however, the same policy approach has not been applied in the SHLAA otherwise all Green Belt sites would also be considered unsuitable.

The presence of an AONB designation, should not immediately mean a site is dismissed, otherwise settlements located entirely in the AONB would never be able to grow sustainably. The local authority has interpreted national policy incorrectly and applied a development management provision to a local plan process. Exceptional circumstances clearly do apply when looking to accommodate housing need, especially when looking to meet identified housing need and this is something which is in the public interest, otherwise the local authority would not be undertaking the exercise of consulting on a local plan.

Furthermore, the site at Pea Lane is located right on the edge of the AONB and adjoins existing development, therefore potential impact will be minimised as the site already has an urban character.

Conclusion

Based on the rational above, the site should be identified as suitable in the SHLAA and should therefore feature in the *Schedule of Site Appraisals (for Large Greenfield Sites)* (October 2017) from which it is currently omitted.

The site should be considered as a reasonable alternative going forward and justified for inclusion within the local plan.

Include files	Hannah Pattinson Galliford Try - Scan 15 Aug 2017 12.34.pdf
Number	Question 46
ID	LPIO21669
Full Name	Mr John Monk
Company / Organisation	
Position	
Agent Name	Mr Nick Shute
Company / Organisation	Nick Shute Associates
Position	Planning and regeneration consultancy
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<u>Response:</u>

The Schedule of Site Appraisals includes site no. O-h2, relating to land north east of Grange Road, Wilstone. Before the Ipa decide to allocate this site for development, it should consider the merits of the land at Dixon's Gap North, which was submitted to the Council as a potential housing allocation in 2012 and is submitted again in the 2107 Call for Sites. The site at Dixon's Gap has a number of advantages over the land at Grange Road, including:

- It will not result in the loss of a greenfield site that is in viable agricultural use;
- It is further away from the area of archaeological significance;
- It will be a less visually intrusive development with less impact on the character of the surrounding countryside due to the significant vegetation on the boundaries which can be retained and reinforced;
 - It can provide enhanced bus, pedestrian and cycle links between Dixon's Wharf/ Dixon's Gap and the village and wider

The Dixon's Gap North site also offers similar advantages to the Grange Road site, i.e. the possibility of providing affordable housing to meet local needs, help to support local services in the village, help provide employment and skills, help maintain local community facilities and provide additional green space to benefit local residents.

We therefore suggest that Dixon's Gap North should be considered as a higher priority for allocation as a housing site than land at Grange Road. It will also act as a continuation of existing built development at Dixon's Wharf, using vacant formerly developed land rather than a greenfield site.

Include files	
Number	Question 46
ID	LPIO21672
Full Name	Mr Andy Criddle
Company / Organisation	Dacorum Sports Network
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Please find attached a submission on behalf of Tring Sports Forum (TSF) in response to the Local Plan Issues and Consultation. This submission is made by TSF on behalf of and with the full agreement of our 17 local community sports clubs in Tring who have a combined membership of well over 4000 people. The submission

includes a detailed indication of the current and future sporting needs of the town and how these can be accommodated within the essential infrastructure development that will be needed to support the proposed housing/population growth. We have further data and detail available to explain and justify the proposals within our submission (including the indicative plan we have supplied for the allocation of space for sports and leisure). We suggest and request a meeting with Dacorum Borough Council (DBC) Planning Department's officers to discuss this data and how the required sporting facilities can be effectively integrated, in such a way that they can be sustainably managed by the local community, before the Pre-Submission (Publication) Plan is drafted over the coming months.

The facilities required have been calculated based on:

- Dacorum Borough's own evidence base including the Dacorum Playing Pitch Strategy & Action Plan 2015-2025
- Awareness of the current and projected facility needs of local community clubs in Tring
- The scale of expected population growth as indicated in DBC's Issues and Options Consultation document
- Tring Town Council's own consultation response and their expressed preferences for development in Tring
- Herts. County Councils own proposals and submissions relating to Tring

Our submission and indicative plan offer a number of additional benefits beyond just the provision of extra playing facilities for community clubs. These include:

- A green buffer zone between any new development on Tr-h5 and current residential properties on Station Road and Damask Close.
- A leisure and fitness trail which would provide not only an amenity for all ages (cycling, walking, jogging, fitness stations etc.) but also a safe access route between the Town and local amenities, including Sports Clubs, as well as any developments on Tr-h5 such as a school, housing and/or business parks
- More than 200 additional car parking spaces for the sports facilities either side of Cow Lane to solve current and likely to be increased parking problems, traffic and safety issues in this area
- Ecological maintenance of all existing hedgerows
- Integration of an extended commercial area including a Business Park to provide additional employment opportunities as well as a potential site for a petrol station

Our indicative plan is provided as a starting point for discussion on how the infrastructure requirements (especially for sport and leisure) can be integrated into the local plan and also the best site solution for the Town in terms of housing and infrastructure development. Our

suggestions for the development of Tr-h5 provide potential options for either new housing (for up to circa 300 new homes) or additional secondary and primary schools, or a new larger school to replace the existing Tring School (the site of which at Mortimer Hill could then be developed for housing – with integrated green space – for circa 300 new homes).

Submission

- 1 Given the points raised in (3) above, the site at Tr-h5 (Dunsley Farm) provides the best and most viable opportunity for the location of additional sporting facilities. This site becomes even more appropriate for the needs of the town if a new secondary school were to be built, as this site could provide for shared use of new playing facilities. If a new school is not required on this site then approximately 300 houses could be accommodated instead while still providing the additional sports and leisure space required by the town.

A plan has been supplied with this document to indicate how the new sporting facilities could be integrated as part of a mixed-use development of Tr-h5 - including:

- 1 additional business units
- 2 a new secondary school (if required) including school playing fields – or housing in its place
- 3 a football hub at the Cow Lane end of the site
- 4 the hockey ATP and expansion space for the Tring Cricket Club multi-sports hub at the town end of the site

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 meeting the current and urgent need for additional sporting facilities in Tring.

Participating clubs

Tring Sports Forum represents the following clubs with a total playing and social membership in excess of 4000 (including more than 1500 junior members):

- Tring Anglers
- Tring Athletic Football Club
- Tring Bowls Club
- Tring Hockey Club
- Tring Lawn Tennis Club
- Tring Park Cricket Club
- Tring Rugby Union Football Club
- Tring Running Club
- Tring Squash Club
- Tring Swimming Club

	<ul style="list-style-type: none"> • Tring Table Tennis Club • Tring Tornadoes Junior Football Club • Tring Tornadoes Netball Club • Tring Tornadoes Futsal Club • Tring Town Football Club • Dacorum Back to Netball (Tring Group) • Chiltern Canoe Club
Include files	TSF Plan layered 2017 lr updated.pdf
Number	Question 46
ID	LPIO21673
Full Name	David Mitchell
Company / Organisation	Redbourne Parish Council
Position	Chairman
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>I am writing on behalf of Redbourn Parish Council to voice our objection to the proposal option for 4,500 houses at north Hemel over 422 hectares of green belt. We note that in the supporting documents, you say there would be <i>"substantial loss of Green Belt land and major northward expansion of Hemel Hempstead towards Redbourn and into open countryside that partly falls in St Albans district."</i></p> <p>We believe that development on this scale into Redbourn Parish (St Albans District) would be contrary to the green belt purposes in the NPPF. In the maps provided in your consultation, it is indicated that development would go close to the outskirts of Redbourn village, near Tullochside Farm, leading to coalescence between Hemel Hempstead and Redbourn.</p> <p>Should 2,500 or more houses also be built at east Hemel Hempstead (as part of the St Albans District local plan) alongside 1000+ at Spencers Park, the total number of new houses in the area would be well in excess of 8,000. The environmental and infrastructure impact of so many houses all in one place would be extremely detrimental to both north Hemel Hempstead and Redbourn village. Of particular concern would be the volume of traffic on the Redbourn Road / Hemel Hempstead Road.</p> <p>It also difficult to see how this concentration of development in one area would benefit Dacorum as a whole. People prefer to live near their families and friends, and work close-by if possible. Housing development should be spread out over the borough as a whole. This would also help to prevent north Hemel</p>

	Hempstead / west Redbourn becoming a building site for the next 20 years.
Include files	
Number	Question 46
ID	LPIO21675
Full Name	Louis Quail
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 see attached letter from the Berkhamstead residents Action group which I support whole heartedly , its quite sad that we are considering building on greenbelt land which belongs to our children and theirs because of political pressure, and while we still have not explored many other options. For example why is there a lights off building culture in London where it is considered ok to build houses that are then left empty. The point being the augment for building on greenbelt land should only be one of last resort , there are plenty of other options left before launching off this one way route .</p> <p>Berkhamsted Resident Action group response:</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 and 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 & 2) that has proved to</p>

be a deeply flawed process
(~~http://www.berkhamsted.gov.uk/development/DBC/DBC%20Guidance%20Review%20-%20Stage%201~~)
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 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 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
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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"> • 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.
Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO21703
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • CPUK is specifically interest in land at Tring, and has submitted along with these representations a call for sites submission for Land South of Aylesbury Road, Tring. The site plan is provided at Appendix 1. The full Call for Sites Submission is Appendix 2.

	<ul style="list-style-type: none"> An accompanying report by ETLA has provided an overview of the Green Belt Assessments in the context of the site. The report concludes that the site could be removed from the Green Belt without significant harm to the Green Belt purposes. The allocated LA5 within the Site Allocations/ Core Strategy results in an adjustment to pattern of Tring; land south of Aylesbury Road, provides a further rounding off to the settlement, within the confines of the A41, ensuring a well- defined and permanent boundary that would prevent against urban sprawl. The Land South of Aylesbury Road, has an existing road frontage, and is well contained within the wider landscape context. This contrasts with the proposed site north and east of the settlement Tr-h1 to Tr-h5, where other than the rail line for Tr-H1 there is no well-established and permanent defensible boundary to prevent further sprawl being these locations. For the above reasons, consideration should be given to the allocation of Land South of Aylesbury Road for housing, as detailed in Appendix 2 of this response.
Include files	Richard Butler - 0104_Tring-LVA-V1 for submisison.pdf Richard Butler - 0104-L04 - Tring. Vision Plan for submission.pdf
Number	Question 46
ID	LPIO21704
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> CPUK is specifically interest in land at Tring, and has submitted along with these representations a call for sites submission for Land South of Aylesbury Road, Tring. The site plan is provided at Appendix 1. The full Call for Sites Submission is Appendix 2. An accompanying report by ETLA has provided an overview of the Green Belt Assessments in the context of the site. The report concludes that the site could be removed from the Green Belt without significant harm to the Green Belt purposes. The allocated LA5 within the Site Allocations/ Core Strategy results in an adjustment to pattern of Tring; land south of Aylesbury Road, provides a further rounding off to the settlement, within the confines of the A41, ensuring a well- defined and permanent boundary that would prevent against urban sprawl.

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Number	Question 46
ID	LPIO21705
Full Name	Countryside Properties (UK) Ltd
Company / Organisation	C/O Bidwells
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> CPUK is specifically interest in land at Tring, and has submitted along with these representations a call for sites submission for Land South of Aylesbury Road, Tring. The site plan is provided at Appendix 1. The full Call for Sites Submission is Appendix 2. An accompanying report by ETLA has provided an overview of the Green Belt Assessments in the context of the site. The report concludes that the site could be removed from the Green Belt without significant harm to the Green Belt purposes. The allocated LA5 within the Site Allocations/ Core Strategy results in an adjustment to pattern of Tring; land south of Aylesbury Road, provides a further rounding off to the settlement, within the confines of the A41, ensuring a well- defined and permanent boundary that would prevent against urban sprawl. The Land South of Aylesbury Road, has an existing road frontage, and is well contained within the wider landscape context. This contrasts with the proposed site north and east of the settlement Tr-h1 to Tr-h5, where other than the rail line for Tr-H1 there is no well-established and permanent defensible boundary to prevent further sprawl being these locations.

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Include files	Richard Butler - Land South of Aylesbury Road - Call for Sites doc.pdf Richard Butler - 0104-L04 - Tring. Vision Plan for submission.pdf Richard Butler - 0104_Tring-LVA-V1 for submisison.pdf
Number	Question 46
ID	LPIO21730
Full Name	Roger Saller
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 & 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. Having lived in Berkhamsted since the beginning of this century, I feel that I have a unique perceptive on what made the town attractive and what is now at risk.</p> <p>I have been a resident of Berkhamsted for 18 yrs and have seen services stretched to their limit! I have experienced the mad rush to infill new homes in back gardens, the conversion of lovely farm fields to high end homes who's roofs tough their neighbour's, and the transformation of Brown Field spaces into dense, multi-story flats. While all of this building has gone on to increase the population, there have been no improvement in infrastructure, except for recent traffic & crossing lights at the end of Shootersway.</p> <p>I am amazed that there are plans to put even more pressure on schools, parking, transportation and the general Lifestyle of the town! I spent almost two decades commuting into London and can personally attest to the nightmare of trying to find a seat for a journey that has increased in cost many times while the service has stayed as poor as when I first started at the dawn of this century!</p> <p>I strongly agree with the responses outlined in the Berkhamsted Residents Action Group (BRAG) (please see attached). Their assessment is thorough, thoughtful and has the best interest's of the Berkhamsted Community, not those of Developers or Bureaucrats.</p> <p>I trust that the Democratic nature of this town, Borough, and Society will prevail and a balances and visionary plan will prevail!</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

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 results of the review are available on the DBC website and the DBC website)~~
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

- 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
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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
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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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Include files	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO21739
Full Name	Mr and Mrs Graham and Debbie Clarke
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>You have sought input on Dacorum's Local Plan to 2017 and I am doing so here. We particularly reference the option relating to My-h2 Pickford Road.</p> <p>We note your grid of assessment in the Site Appraisals SA Working Note, summarising each site against a number of SA Objectives. This could imply that each SA Objective carries equal weight. Whilst we agree that these are all valid aspects to consider, different stakeholders would regard some as more important than others. We assume that virtually all options have the potential to impact SA13 (Housing) and SA15 (Employment). As a local resident, we particularly want to draw your attention to the following which I believe should carry particular high weight:</p> <ul style="list-style-type: none"> • Incompatibility with the Chilterns Management Plan 2014-19 (with a time period still to run). <ul style="list-style-type: none"> • Likely incongruity of style and appearance to the immediate environment, given the number of homes proposal in the • Safety, increased noise and traffic, particularly into • Absence of local infrastructure to support the new residents, adversely affecting the whole <p>The proposed development opposite the corner of Friendless Lane and Pickford Road is not in the village of Markyate as stated in your documentation but in Cheverells Green.</p> <p>Cheverells Green is a small hamlet of individual homes, mainly set around a green, on the edge of the Chilterns. The hamlet adjoins the village of Markyate, is sited at</p>

the start of a designated Area of Outstanding Natural Beauty and is in the Hertfordshire Green Belt.

The proposed development is not compatible with the principles set out in the Chilterns Management Plan 2014-19, endorsed by Decorum Borough Council 26 May 2015. Frankly, we are surprised that in a climate of more enlightened zonal planning and sympathetic development, any developer would now contemplate such an incongruous scheme.

There seems no point in having plans, designation of AONB and Green Belt to then override the reasons for their existence.

The proposal is of fairly high density, affordable housing in Cheverells Green (not Markyate) wholly inconsistent with any of the nearby properties, a number of which are listed. Our understanding is that the “bad period” of incongruous developments has been replaced with zoning. This development is inconsistent with the zone it will sit in. It seems to us a return to squeezing in housing irrespective of being sympathetic to immediate environment. We do understand the pressure you are under to identify new sites in the context of housing shortage but a return to inappropriate development such as this should nevertheless, be avoided.

The nearest public transport links are a very limited bus service through the village of Markyate, around a mile away. We doubt this would change.

There are no pavements or safe crossing for pedestrians between the proposed development and the pavements which begin at the top of Markyate village. It is not easy to see how these could be constructed whilst maintaining the visual beauty of Cheverells Green.

The nature of the high density development and absence of close public transport links will necessitate residents to have at least one vehicle per household, to be able to access any service, shop, school or employment.

We have previously submitted our concerns about the considerable traffic issues facing the village and are not aware of any plans to alleviate these despite much local lobbying.

Markyate High Street is a beautiful historic and listed street. Its beauty and historical significance is already overshadowed by traffic pressure which the planning and highways authorities have failed and probably is unable, to address due to physical constraints. It has limited street width, lined with listed houses and cannot cope with current traffic volumes. There is inadequate parking provision for existing residents. The street is unable to deal with the two-way traffic flow, causing holdups and encroachment onto the pavements. Further traffic through the village will exacerbate this already unsatisfactory, and on occasions, unsafe situation.

The proposed development will add particular pressure to the junction of Pickford Road with Markyate High

Street. The small “safety” bollard on the pavement to protect the corner house from encroaching traffic is often the subject of damage and repair.

At peak time it is not unusual to have a 30 cars queued down Pickford Road, unable to turn into Markyate High Street. This is particularly acute during school drop off and collection time when non-village traffic is attracted to the area by families accessing the independent Beechwood School which is close to this proposed development.

We would also ask that the planning authority considers the traffic flows that would result between this proposed development and the village primary school as we anticipate that these add pressure to residential areas such as Corner Wood, Parkfield and Cowper Road.

We are delighted that the village is able to sustain a number of small businesses – however the lack of parking for the majority of customers who are non-residents of the High Street does add pressure. Without an acceptable strategic solution, this will only increase with more homes in the area.

We therefore conclude that the additional traffic from this number of additional homes, relative to street capacity and existing traffic will increase congestion and risk of accidents.

The local infrastructure is already inadequate and the planning authority should have ensured that it was improved to accommodate recent developments in the village, let alone this.

Sadly, we must draw attention again to the disastrous consequences of the Hicks Road development in Markyate. We had understood that the planners had secured infrastructural benefits to the parish by way of traffic lights on the A5, relief of traffic on the High Street, additional parking and a new GP surgery. Residents still await these promised and much needed improvements.

You will therefore forgive our lack of confidence in the planning authority being able to secure any future improvements linked to planning consent conditions given the fiasco we have witnessed in the last 2 years (e.g. work on the A5 being abandoned mid-way through installation; space promised for the new village GP surgery has been deemed inappropriate by NHS England; inadequate parking provision for new developments in a village already poorly provided for; and two retail units for which there appears to be no tenants because they are in ludicrous locations). We wrote to Mike Penning regarding our near fatal accident coming out of Markyate onto the A5 (now the A5183). The link road between the A5 and the M1, north of Dunstable, has not reduced traffic and indeed, when there is congestion and accidents on the M1, it brings more traffic past Markyate, which is fast moving. **A car sped through the traffic lights, hence our near fatal accident** (and there are plenty of other cases recorded, including fatalities).

	<p>I recommend you access and read Markyate Facebook pages, especially following Mike Penning's declaration of support to expand Markyate village. You will find a multitude of comments severely questioning his judgment, level of on-the-ground knowledge and lack of engagement with the village ahead of declaring his view, as oppose to reflecting constituents views</p> <p>Thank you for an opportunity to provide these concerns at this stage and I trust you will take these into account in your deliberations.</p>
Include files	
Number	Question 46
ID	LPIO21742
Full Name	Thomas and Margaret Ritchie
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 not completed the full consultation document but my wife and my views are completely in line with the comprehensive return made by Berkhamsted Town Council and most importantly our only choice of the options for number of dwellings and their location is Option 1B.</p> <p>In addition to the line of questions in the document, I should like to make some further more general points about the direction in which this discussion seems to have taken us; it would be interesting to learn whether this focus was anticipated in setting up the New Plan.</p> <p>The process seems to take firstly the position of the simply physical capacity of the landscape to take a certain number of homes; in this and by using the "call for sites" process, we have inevitably been led to where we are by a large number of land-owners, private and corporate, who have a single objective - to make money. Having made land availability the first option point, the reports then try to solve/resolve the issues which this land availability gives us:</p> <ul style="list-style-type: none"> • access • road structure • train and station capacity • water resource • spoilage of natural resource • abandonment of Green Belt policies • disturbance of existing townscapes • infrastructure of school places; especially Secondary school places • medical facilities - GP capacity; dentists; hospital access; care provision • local job opportunities

In my view, whilst some of these issues are identified in the reports, very little is offered to resolve the created questions.

Returning to the "call for sites" methodology and the people who are offering options, they have been hugely encouraged by the idea that previously protected Green Belt would be sacrificed to the "superior" demand of providing housing numbers.

Look at the action being promoted already, by Crest Nicholson, a major developer, who, without even waiting for the first stage of consultation to be completed, is campaigning for some 100 houses in Shootersway green belt, with a density much higher than its traditional neighbourhood.

These opportunist developers all need to be put back in their boxes with an adoption of Option 1B, which needs no Green Belt intrusion in Berkhamsted.

To solve the housing need, including a high number of affordable dwellings, we need to look afresh at the direction of travel. Rather than starting with a developers' shopping list, we should turn the process around and plan to build additional houses WHERE THERE ALREADY IS INFRASTRUCTURE - of local employment opportunity, of school places, especially Secondary places, of GP and medical facilities with capacity, of transport links.

It is not magic - all these exist in the major town within the Borough - Hemel Hempstead: the industrial area, which has seen huge growth and offers local employment; seven Secondary schools (a number of which are currently too small to succeed); the medical facilities of GP service providers and the HH hospital; a main line rail station and closeness to M1 junction.

That surely is what a New Town was built for and surely actually needs to bring more people to the re-invested town centre, three out-of-town shopping areas (as we shall soon have), 17- screen cinema, leisure facilities on which £millions of public and private money has been and will be invested.

Let these items lead the direction in which we must take our communities over the next 20 years and let us not destroy the ancient heritage of our market towns and villages.

Berkhamsted Town Centre response:

Summary

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

Government, dated June 2016, the Minister of State for Housing and Planning, Brandon Lewis, states that “. . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and **with the support of local people.**”

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

In the same letter the Minister states:

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

However, it is very clear from this consultation that the proposed Green Belt releases are driven entirely by the requirement to allow the development of more housing across the Borough.

The urban capacity of Hemel Hempstead needs to be revisited in light of recent statements from central government on the opportunity to increase building heights in suitable locations. A revised and increased urban capacity for the Borough’s main centre would reduce the need to provide for more Green Belt releases.

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

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

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

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

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

BTC Response to Q46:

A significant loss of Green Belt here would create urban sprawl, contrary to one of the main purposes of the

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

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

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

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

	<p>road traffic would add to any congestion on the Swing Gate Lane roundabout caused by new traffic to and from "South Berkhamsted."</p> <p>The density is too high for the neighbouring Character Area.</p> <p>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.</p> <p>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.</p> <p>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</p>
Include files	
Number	Question 46
ID	LPIO21770
Full Name	Elizabeth Hamilton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In the draft Schedule of Site Assessments, there is no mention made of the location or significance of any public rights-of-way, including long-distance routes. As paragraph 75 of the NPPF states that 'planning policies should protect and enhance public rights of way and access', this is a significant omission and should be rectified before further analysis is carried out.
Include files	
Number	Question 46
ID	LPIO21771
Full Name	Carl Perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Bovingdon is a large village that has been the receiver of much development in the past. This has been done piecemeal and consequently the infrastructure is at

	<p>breaking point. You are proposing more development that again is piecemeal and not proposing any improvement to the roads, parking, schools or medical services. An increase of homes by 20% without tackling these problems would be a seriously irresponsible error by Dacorum Council. The total size of the village has been protected by the Green Belt and you would be ignoring current Government Guidelines in this matter should you erode the protective Green Belt around the village.</p> <p>Box lane is already severely congested, especially on Saturdays and I do hope that you have considered what it would be like when Chesham expands as proposed and many extra cars use Box Lane to get to Hemel Hempstead.</p>
Include files	
Number	Question 46
ID	LPIO21773
Full Name	Marion Perkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Having studied your proposals I have the following comments to make:</p> <p>Bovingdon is a large village that has been the receiver of much development in the past. This has been done piecemeal and consequently the infrastructure is at breaking point. You are proposing more development that again is piecemeal and not proposing any improvement to the roads, parking, schools or medical services. An increase of homes by 20% without tackling these problems would be a seriously irresponsible error by Dacorum Council. The total size of the village has been protected by the Green Belt and you would be ignoring current Government Guidelines in this matter should you erode the protective Green Belt around the village.</p> <p>Box lane is already severely congested, especially on Saturdays and I do hope that you have considered what it would be like when Chesham expands as proposed and many extra cars use Box Lane to get to Hemel Hempstead.</p>
Include files	
Number	Question 46
ID	LPIO21775
Full Name	Adrian Watney
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 been made aware of the above and the proposals to substantially increase housing in Bovingdon. I have seen a plan with the proposed sites and I am aware of the proposed build options for a total of 450 new homes which would increase the village's total homes, population and cars by 25%.</p> <p>I do understand the need to substantially increase housing in England and the shortage of housing has clearly reached a critical level. However, the necessary infrastructure must be in place before any development in Bovingdon takes place.</p> <p>There are severe infrastructure problems in Bovingdon even before the 90 houses in the existing plan are built. In particular:</p> <ol style="list-style-type: none"> 1 The congestion and chronic lack of parking in Bovingdon High Street is causing severe problems on a daily basis. I, and many others, have expressed our concern to the Parish Council and I am sure you are aware of this. There is an immediate need to increase car parking in the village even before any new houses are built. 2 The local school, Bovingdon Academy, is at or near full capacity with no room to expand. 3 The village doctors and dentists are at or near full capacity and my medical practice is shared with Kings Langley and will suffer twice the impact . 4 There is already a significant risk of flooding at the bottom of Green Lane by the Ryder Memorial. <p>If the above problems could all be addressed and substantially dealt with, then I would have no objection to a significant increase in new houses in the order of 130 homes but, until that happens I strongly urge Dacorum Council to accept Option 2B - 0 houses for Bovingdon</p>
Include files	
Number	Question 46
ID	LP1021777
Full Name	Sheena Watney
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 been made aware of the above and the proposals to substantially increase housing in Bovingdon. I have seen a plan with the proposed sites and I am aware of the proposed build options for a total of 450 new homes</p>

	<p>which would increase the village's total homes, population and cars by 25%.</p> <p>I do understand the need to substantially increase housing in England and the shortage of housing has clearly reached a critical level. However, the necessary infrastructure must be in place before any development in Bovingdon takes place.</p> <p>There are severe infrastructure problems in Bovingdon even before the 90 houses in the existing plan are built. In particular:</p> <ol style="list-style-type: none"> 1 The traffic congestion and chronic lack of parking in Bovingdon High Street is causing severe problems on a daily basis. I, and many others, have expressed our concern to the Parish Council and I am sure you are aware of this. There is an immediate need to increase car parking in the village even before any new houses are built. 2 The local school, Bovingdon Academy, is at or near full capacity with no room to expand. 3 The village doctors and dentists are at or near full capacity and my medical practice is shared with Kings Langley and will suffer twice the impact. 4 There is already a significant risk of flooding at the bottom of Green Lane by the Ryder Memorial. 5 Box Lane is the busiest B road in Hertfordshire and at times, especially on a Saturday when Bovingdon Market takes place on the Airfield, the time it takes to drive to and from Hemel Hempstead is considerable, over an hour one Saturday recently. This is worrying especially with regard to access for emergency vehicles.
Include files	
Number	Question 46
ID	LPIO21781
Full Name	Paul Bougourd
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 write with regard to the above referenced proposal. On reviewing online and studying what is proposed, I can see what I can only describe as a potential disaster for Bovingdon village and the surrounding areas.</p> <p>There is no provision for tackling the Bovingdons needs of the present, let alone the needs of the future if 25 % additional housing stock was to be built in this village.</p> <p>The following is a list of what is real, or potential problems that this proposal does not address.</p> <p><u>Water supply</u></p> <p>The water supply is through an aged pipe system, made up of cast iron, galvanized, plastic and lead pipes. The</p>

	<p>pressure frequently drops making showering etc a long drawn event.</p> <p><u>Electric Supply</u></p> <p>In the past we have had frequent power outages and have been recently treated to many more. A close of five houses were built in Green lane some years ago and the electricity supply could not cope , so for many months a large generator was positioned by the Ryder memorial to increase the supply</p> <p><u>Gas</u></p> <p>The gas supply is struggling to cope with demand with noticeable pressure drops_</p> <p><u>The High Street</u></p> <p>The high street is full to capacity most days with parked cars, I doubt whether it could cope with even another ten more cars venturing trying to use it as a means of driving through. Let alone the potential of a possible 450 houses creating 1350 extra vehicle drive throughs.</p> <p><u>Pollution</u></p> <p>The children at Bovingdon Academy are already being treated to a cocktail of vehicle created filth, which makes the air hazardous to breath, even more at school closing time and admission.</p> <p><u>Community and Medical Services</u></p> <p>These already in use at full capacity, in fact some of the doctors appointments and are now farmed out to Kings Langley to try address demand.</p> <p>In conclusion this village cannot possibly cope with an increase of 25% of everything. The idea of building on green belt what should be held sacred, would create a dangerous president. We need as much green if we are to have air to breath, there is enough land smothered in concrete as it is.</p>
Include files	
Number	Question 46
ID	LPIO21783
Full Name	Mr and Mrs L & S Trybus
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 do not believe that Green Belt should be built on and whilst there is a need for more housing there are more prominent areas on the outskirts of Hemel Hempstead rather than destroying the village and its ethos.</p> <p>In particular respect to Wayside Farm we object vociferously see our points below</p> <p>It's a visually prominent part of the Green Belt, where development would be very noticeable from a distance,</p>

especially on the approach to the village. The rear (western) parts of the site sit some 38m higher than the eastern edge adjacent Watford Road, so that development of the site as it progresses away from the Watford Road would appear tiered and visually intrusive. It would spoil the entrance to the village and would seem like 10 storey buildings from the road and be totally out of character with the village and surroundings. It would be a loss of amenity and land space and does not reflect the current landscape or manage to preserve the Green Belt which is paramount.

The site has no defensible green belt boundary except for the A41, resulting in a very large Green Belt release, should the proposed release go ahead. This would make it impossible to contain the development to the levels being described in the consultation document. We do not want an urban sprawl – the 2004 local plan said to limit urban sprawl. We do not want Apsley, Kings Langley and Watford merging into one town. The identity of the village is important to maintain together with its character and village life that brought families to the area many years ago.

There are a number of sites of historic interest (scheduled monuments) including the Priory remains and site of the Royal Hunting Lodge which could be compromised by the proposed release of Wayside Farm. Maintaining the cultural heritage of the village is paramount

Watford Road, adjacent the site, is very congested in rush hours and a large residential development alongside would have a very detrimental effect on traffic congestion. It is impossible to get out onto the Watford Road at 7:30am in the morning and queuing goes all the way back into the village centre making it a nightmare for workers – it is also a dangerous access for us out onto the Watford Road at the best of times. There is a total lack of thought for the villagers and the High Street is often impossible and congested with traffic trying to get into the village too. The recent development at Apsley has caused huge impact on congestion and the road is not suitable for the volume of traffic it currently has going through the village.

The increase in pollution and carbon emissions will cause untold problems. The current quality of air is poor due and to build in close proximity to the M25 would be detrimental. I am aware that there has been an increase in asthma with families that near to the M25 and building on Wayside Farm will only exacerbate the situation and then will also cause increase pressure on the local GP's.

Charlie Wray's livelihood would be lost, resulting in a lost resource for the village and the Jersey Herd and Raw Milk has brought new people into the village. It is wrong for this to happen. There are also walks that families can enjoy across the farmland to the neighbouring villages at Chipperfield and Commonwood and why should this be taken from us.

Any development which is determined appropriate for Kings Langley should not be concentrated in one large development as it would place intolerable pressure on the over congested road and village amenities. The local

primary and secondary schools are already over-subscribed and no thought has been given to this or to the ability of the doctors surgeries to cope. Trying to get an appointment now is incredibly difficult

There is not the infrastructure in place and just puts added pressure on the community and amenities that we have. Trains are full to capacity and no seats available in rush hour trains and they are packed to bursting. Not enough parking in the village to sustain any more development – people cannot park to shop and therefore trade goes away. We don't understand therefore why the council is so keen to build so many new houses the village even on sites where it has been advised to **'exclude from further assessment and retain as Green Belt'** There are Brownfield sites that could be released and built on first and these should be considered and explored before ruining the Green Belt – once allowed we can never regain the important amenity space for our families and generations to come Kings Langley cannot sustain any new development as the strain on local schools, doctors, roads, public transport and emergency services is already an immense issue. There is no justification for building on Green Belt land – the Council should prioritise protecting it and protect local communities rather than eliminate open space for ever

To have a large development in the village is completely wrong and disproportionate to the size of Kings Langley for all the reasons above and therefore the only option open to consider in the Local plan would be Option1A as this will save our Green Belt and concentrate development in areas where there is room for growth and not over burden our village. We moved here to be in a village not a town.

There is no exceptional circumstance to build on Green Belt land

The Council should take on board the numerous objections from the villagers and listen to them.

Include files	
Number	Question 46
ID	LPIO21791
Full Name	Sarth Ltd
Company / Organisation	
Position	
Agent Name	Mr Matt Wood
Company / Organisation	Lambert Smith Hampton
Position	Director - Planning and Development Consultancy
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	In applying the locational principles, the Council should seek to

	<ul style="list-style-type: none"> - realise opportunities which offer the opportunity to achieve improvements in local character through the redevelopment of sites, - regenerating sites through identifying more appropriate, sustainably located land uses, - locating development in well connected sustainable loctions - avoiding areas at high risk of flooding (<i>and through proactive positive planning reducing and mitigating issues of flood risk and surface water and drainage management</i>) - respecting the character of the settlement and restricting urban sprawl - Protecting character and value of landscapes, heritage and biodiversity (<i>and where possible improving biodiversity</i>) - ensuring new development can be served by necessary infrastructure - ensure new development can support delivery of a 5 year housing land supply, as required by Government <p>Our client's site at Billet Lane, south of the Grand Union Canal scores positively against all of these points if assessed in terms of the potential contribution residential development could deliver.</p> <p>These responses on the Issues and Options consultation should be read in conjunction with the separately submitted representations and supporting documents which have been forwarded to the Council in relation to :</p> <p>The Call for Sites 2017</p> <p>The Brownfield Land Register consultation 2017</p> <p>We would welcome the opportunity of discussing these representations with the Local Planning Authority once officers have had the opportunity of digesting the submissions.</p>
Include files	Mathew Wood - Billet Lane - docs combined.pdf
Number	Question 46
ID	LPIO21815
Full Name	W Lamb ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • Land at Shendish ('the site') has been promoted for development for a number of years • On the basis of both the Council's further analysis in the Green Belt Assessment and an independent Preliminary Landscape Assessment undertaken on behalf of W Lamb Ltd, the area proposed for allocation has been reduced compared to that

previously promoted, and consolidated to the eastern side of the site

- As highlighted in the Introduction, this area has the potential to provide up to approximately 500 residential dwellings to include affordable housing, retention of a 9 hole golf course and creation of public open space, facilitated by improved access to the site and appropriately addressing school requirements (either through on site provision and/or an appropriate off- site contribution). However, the entire site is still proposed for removal from the Green Belt (see **Appendix 2**) for the reasons discussed within these representations
- This section provides a brief overview the site and surrounding area by way of background context.

Land at Shendish

- Land at Shendish covers c.95ha in total and forms part of the settlement of Hemel Hempstead. It is located to the south-west of the town and is surrounded by existing development on three sides, with the fourth boundary formed by the A41
- The main land uses currently on the site comprise Shendish Manor Golf course (located broadly centrally within the site and proposed to be retained), Fairfields buildings and land associated with the existing agricultural use
- The main access to the site is currently from the London Road, via a bridge over the railway line. There are secondary access points from Rucklers Lane and a number of public footpaths also cross the site
- Whilst part of Shendish Manor itself (excluded from the area being promoted) is a Locally Registered Park and Garden and areas of the site are identified as having the potential to be archaeologically significant, there are no national landscape designations covering any part of the site. There are a number of existing hedgerows and tree belts which define boundaries within the site and provide screening to the surrounding area

Shendish Manor

- As highlighted above, Shendish Manor itself is part of the land which is excluded from the land being promoted for development
- Shendish Manor and associated outbuildings currently operate as a hotel, located centrally within the parcel of land but excluded from the actual proposed allocation (see site location plan). The area excluded from the allocation also includes Apsley Manor Farmhouse and the Golf Club building both of which are Grade II listed

Notwithstanding its location within the Green Belt, the Shendish Estate (excluded from the site area) has experienced significant development over the last two decades, including additional housing (in the form of c. 8 detached executive houses, 20 barn conversions and a number of replacement dwellings) and other developments such as a large extension to Shendish Manor Hotel.

More recently, a further planning application for the construction of a free standing building to provide 30 guest bedrooms, 8 staff bedrooms, spa, leisure club and additional function facilities with car parking, together with landscaping restoration for the historic grounds was approved by the Council on 26 July 2017 (application ref: 4/02876/16/MFA).

Surrounding Area

The A41 forms the western site boundary of the land being promoted and the southern site boundary is defined by the rear gardens of properties along Rucklers Lane. These comprise larger, more dispersed properties at the western end, transitioning to a tighter grain of terraces and semi-detached properties towards the eastern end close to the junction with London Road under the railway bridge

The north eastern boundary of the site is defined by the railway line, beyond which is London Road, the main road in the area which contains a mix of residential properties, businesses/employment, and various scale retail opportunities. The railway station car park is accessed from London Road, with the station itself located approximately halfway along the northern boundary.

Land immediately to the north west of the site currently comprises the Manor Estate, a pre-war housing estate, and the more recent Manor Estate Extension which is currently under construction. The nearest primary school, Two Waters, is also located in this area

Apsley is an established neighbourhood forming part of the larger town of Hemel Hempstead. It pre-dates the post-war new town development, prior to which it was a physically distinct settlement. Much of the housing, as well as retail and employment facilities, dates from the pre-war period and the area has been the focus of extensive regeneration efforts in recent years

The centre of Apsley is located 2.5km to the south of Hemel Hempstead town centre. The ward population (Kings Langley) was recorded at 5,214 in the 2011 census. The neighbouring ward of Apsley and Corner Hall had a population of 9,003 in that census

Apsley centre is less than 1km north of the site, with Apsley railway station (providing half hourly trains to London Euston) immediately adjacent to the northern site boundary. There are a number of facilities located in close proximity to Shendish, including Doolittle Meadows Business Park, the recently remodelled offices at Westside approximately 700m from the site, Apsley Hills Sainsbury's superstore and other retail units at Apsley Mills Retail Park only 780m from the centre of the site.

Include files

Number

Question 46

ID

LP1021841

Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> The comments below relate to site reference HH-h3 ('Land at Shendish, London Road), which is promoted by W Lamb Ltd. Comments on the draft Schedule of Site Appraisals (DSSA) and on the accompanying Sustainability Appraisal Working Note have been separated for ease of reference <p><i>Draft Schedule of Site Appraisals (DSSA)</i></p> <p><u>Proposed Uses / Potential Housing Capacity</u></p> <p>The site has previously been promoted for removal from the Green Belt with potential to provide approximately 900 homes, a primary school, employment use, retention of a 9 hole golf course and creation of public open space, facilitated by improved access to the site. This is reflected in the DSSA under 'Proposed Use(s)' and 'Potential Housing Capacity'.</p> <p>As highlighted previously, on the basis of both the Council's further analysis in the Green Belt Assessment, an independent Preliminary Landscape Assessment undertaken on behalf of W Lamb Ltd, and Boyer's independent Green Belt Review (Appendix 3), the area proposed for allocation has been reduced compared to that previously promoted, and consolidated to the eastern side of the site. This approach broadly accords with the Council's own Green Belt Assessment, which concluded that the entire site defined as D-S3 should be removed from the Green Belt (prior to incorrectly applying a Landscape Assessment – see response to Question 9 for further details).</p> <p>It is therefore considered that the entire site should be removed from the Green Belt and that future development should be concentrated on an area closer to the existing built up area of Apsley and Rucklers Lane (see illustrative plan at Appendix 2).</p> <p>This area comprises c. 30ha in total and is considered to have potential for up to approximately 500 residential dwellings to include affordable housing, retention of a 9 hole golf course and creation of public open space, facilitated by improved access to the site. The DSSA should therefore be updated accordingly. To aid this, these representations are accompanied by an updated Site Appraisal Proforma (Appendix 6), which supersedes that previously submitted to the Council.</p> <p><u>Landscape Value / Sensitivity</u></p> <p>Under 'Technical Studies Assessment', the DSSA identifies that the Stage 2 Green Belt Review and Landscape Appraisal considered the site to have 'medium-high' landscape sensitivity. This is a very broad brush assessment however, particularly as the Shendish site covers some 95ha in total and is very varied in terms</p>

of its landscape character and associated landscape sensitivity. Whilst areas in proximity to the Shendish Manor Estate may be considered to have high sensitivity due to its elevation and parkland character, a number of areas have been identified as part of Capita's Preliminary Landscape Appraisal as having lower landscape value and sensitivity, and are therefore more suitable for development.

This includes the lower lying part of Shendish Manor Golf Course, which has a lower elevation and greater containment by perimeter vegetation. It also has a weaker relationship with the main area of the golf course and the grounds of Shendish Manor. There could be scope for a strong landscape boundary to be implemented to reinforce existing tree lines which, with other landscape mitigation, could provide a distinction between a revised urban area and open countryside if the site was allocated for development

Adjoining this, the eastern part of the site (to the north of Rucklers Lane and south-west of the railway) is also regarded as only having moderate overall landscape sensitivity due to the containment by vegetation, its lower lying elevation and proximity to the existing urban This parcel benefits from existing boundary vegetation which would help to act as a good buffer between the site and open countryside if the site were to be allocated for development.

The areas discussed above broadly reflect the area which was recommended for further assessment in the Council's Stage 2 Green Belt Review, reinforcing the suitability of this part of the site for allocation for development.

In addition to this, an additional area of land between Fairfields and Rucklers Lane is also considered to have reduced landscape sensitivity due to the proximity of housing on Rucklers Lane and the lower elevation of the land. There could also be scope for a strong landscape boundary to be implemented to reinforce existing trees, which with other landscape mitigation, could provide a distinction between a revised urban area and/or access requirements and open countryside if this part of the site was also allocated for development. This would be carefully designed as part of any subsequent planning application on the site.

The varying landscape character and associated landscape sensitivity of the Shendish site should therefore be reflected in the DSSA, to ensure that areas of the site which are considered more suitable for development are not unnecessarily rejected due to other parts of the (very large) site being considered to have a higher landscape sensitivity.

Given the above, it is considered that the area proposed for allocation at **Appendix 2** should be subject to a separate assessment by the Council as part of the site selection process to the new Local Plan, in order to confirm its suitability for significant new housing development. This should be a separate exercise to the review of the current Green Belt boundary however, as (for the reasons discussed in response to Question 9) it is considered that the full extent of the Shendish site

	<p>should be removed from the Green Belt, up to the A41 and Rucklers Lane.</p> <p><u>Sustainability</u></p> <p>Whilst the DSSA includes a ‘Sustainability Conclusion’ in respect of the site, it is considered that the DSSA itself does not include a sufficiently thorough assessment of the sustainability credentials of the site.</p> <p>The site is located within a highly sustainable location on the edge of Hemel Hempstead and close to Apsley Railway Station. This is particularly relevant given the Government’s push towards increasing development densities around public transport hubs (see responses to Questions 12 and 44). Apsley centre is less than 1km north of the site, with Apsley railway station (providing half hourly trains to London Euston) immediately adjacent to the northern site boundary. There are a number of facilities located in close proximity to Shendish, including Doolittle Meadows Business Park, the recently remodelled offices at Westside approximately 700m from the site, Apsley Hills Sainsbury’s superstore and other retail units at Apsley Mills Retail Park only 780m from the centre of the site.</p> <p>At present however the relative sustainability of each of the large greenfield sites being considered within the DSSA have not been assessed in sufficient detail given the scale of the sites being considered for new housing development</p> <p>It is essential that further details regarding sustainability are fed into the assessment to ensure that the background information supporting all future allocations is robust, in order for the plan to ultimately be found sound at examination</p>
Include files	Ellen Timms W Lamb Ltd - 171213 Issues and Options reps - Final (reduced).pdf
Number	Question 46
ID	LPIO21843
Full Name	W Lamb Ltd
Company / Organisation	W Lamb Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> For the reasons discussed above in relation to the DSSA and accompanying Sustainability Appraisal Working Note, it is considered that the entire site at Shendish should be removed from the Green Belt and that the eastern part of the site should be allocated for new housing development, as illustrated at Appendix 2. The proposed allocation has the potential to provide up to approximately 500 residential dwellings in a highly sustainable location close to

	existing public transport nodes, in particular Apsley Railway Station, in accordance with national policy and the Government's ambition to speed up the delivery of new housing by focussing new development at sustainable locations such as this.
Include files	
Number	Question 46
ID	LPIO21845
Full Name	Bevangrace Limited
Company / Organisation	Bevangrace Limited
Position	
Agent Name	Paul Cronk
Company / Organisation	JB Planning Associates
Position	Principal Consultant
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Site</p> <p>We submit on behalf of our client, Bevangrace Ltd, details of a site (see drawing: 1290/02) which we consider to be suitable for residential development. Details of the site's ownership are included within the accompanying submission form.</p> <p>The site measures approximately 0.2 hectares and is located at the south-eastern end of Ridgeway Close, a residential road which provides access to the site. The land is fully enclosed by London Road (A4251) to the south and the railway line to the north. Ridgeway Close is situated within the Apsley area of southern Hemel Hempstead. The site itself is currently designated as Green Belt on the Policies Map, immediately adjacent to the existing urban area to the north and west.</p> <p>The local area is generally urban in character, with residential properties along the south- western side of London Road, and a large office building with associated car parking immediately to the north-east. Further to the east, the Nash Mills Wharf development is clearly visible from London Road, adding to the urban character in this locality. To the south-east along London Road is the Red Lion public house, situated adjacent to the railway bridge which separates this part of Hemel Hempstead from land to the south and west. To the north is Doolittle Meadows Business Park, Apsley Railway Station and residential development within the existing urban area. Two bus stops are located within easy walking distance of the site along London Road.</p> <p>Availability</p> <p>The site is available for development immediately, and residential development on this site could be delivered within the next five years.</p> <p>Proposed Use</p> <p>It is proposed that the site be developed for residential use. It is estimated that approximately 10-12 new dwellings could be provided on this site, in the form of 1 and 2 bedroom flats within one suitably designed</p>

building, or alternatively a small number of houses could be accommodated on the site.

As part of these proposals, it is envisaged that a turning head would be provided on the site. This would provide a benefit to the existing residents of Ridgeway Close, who currently do not have any suitable vehicular turning areas within the road.

Suitability

In terms of suitability, we comment below upon the key factors which, on our opinion, demonstrate why the residential development of our client's site is appropriate.

Green Belt Amendments

With regard to the principle of development for residential purposes, we consider that the site presents a logical opportunity to adjust the current Green Belt boundary, to correct what we regard as an anomaly. The land in question is located within a generally built-up urban context, with existing development surrounding much of the site. The railway line, situated to the south and west, and London Road, to the north and east, almost entirely contain the site. Consequently we consider that the site is well related to the existing urban area, and is not related to the surrounding areas of Green Belt.

The functions of the Green Belt and its 5 stated purposes are set out in paragraph 80 of the National Planning Policy Framework (NPPF). Having regard to the well defined and enclosed nature of the land, we do not consider that development would result in unrestricted sprawl of a large built-up area, and neither will it encroach into the countryside. Similarly, development of this site would not cause Hemel Hempstead to merge with any other settlement, due to its enclosed nature and its relationship to the existing urban area.

Meanwhile, in the context of insufficient brownfield land being available within existing urban areas to meet housing needs, the release of this site for development would not prevent any suitable urban land also coming forward for development. In relation to the remaining purpose of Green Belt land, this site clearly does not function to preserve the setting and special character of a historic town.

We note that the site forms part of Green Belt parcel GB14B, which was assessed as part of the November 2013 Stage 1 Green Belt Review produced for the Borough Council by Sinclair Knight Merz. This parcel of Green Belt land generally covers the area between Hemel Hempstead and Kings Langley, to the south of the railway line, with the site at Ridgeway close forming its far northern boundary where it meets Hemel Hempstead. Its main function is identified as contributing towards maintaining the setting of Kings Langley and maintaining the existing settlement pattern by maintaining a gap between Hemel Hempstead and Kings Langley.

The 2013 assessment notes that urban characteristics are strongest to the southwest of Hemel Hempstead (where the site is located), and that this northern part of the assessment parcel has a sense of containment, with limited opportunities for long distance views. It further

notes that within this part of the parcel the proximity and frequency of built form gives an urban edge character. This northern part of parcel GB14B is therefore identified for further assessment as a strategic sub-area (D-S3). The Stage 1 assessment concludes that:

“Assessed in isolation the strategic sub-area makes a limited or no contribution towards checking sprawl, preventing merging or safeguarding the countryside. A reduction in the size of the strategic parcel would not significantly compromise the primary functions of the Green Belt or compromise the separation of existing settlements.”

The ARUP Stage 2 Green Belt Review and Appraisal Report (January 2016) has reconfirmed that the lower (eastern) part of the site is less sensitive in Green Belt and landscape terms and recommended that a Green Belt boundary amendment be considered given that the removal of the sub-area would not compromise the ability of the wider Green Belt to meet its purposes.

It is therefore clear that in addition to the site itself being, in our view, an anomaly making no contribution towards the functions of the Green Belt, the wider area of Green Belt of which it is part. In this context, we consider the development of this self-contained parcel within an urban fringe context to be entirely appropriate, having regard to the purposes of the Green Belt.

Sustainability

The site is sustainably located immediately to the south of the Hemel Hempstead urban area, which provides a wide range of shops, services and employment opportunities. Apsley railway station is located approximately 700 metres to the north-west, and two bus stops are located on London Road within approximately 150 metres of the site.

Access

Access to the site is provided via Ridgeway Close, an un-adopted residential road. We confirm that the landowner has a right of access over this road, and thus a suitable access is available to serve a future development. Such development would have the added benefit of providing a turning area at the end of Ridgeway Close for service and other vehicles, as none currently exists.

Trees

The site previously contained a number of mature trees (some of which were covered by a Tree Preservation Order) which somewhat restricted development of the site. However, we understand that nearly all of these trees have now been removed by Network Rail due to their potential danger to trains using the adjacent railway lines.

Noise

The railway line runs to the south of the site, with London Road (A4251) immediately to the north. We do not anticipate that noise from these sources would be a sufficient constraint to prevent development on this site, as suitable mitigation measures such as the use of appropriate window glazing should be sufficient to create

	<p>an acceptable living environment. We note that the existing dwellings along Ridgeway Close are also situated between the railway line and London Road, and that these dwellings provide an acceptable living environment for residents. Consequently we do not consider that noise from these sources would be a constraint that would prevent residential development at this location, and detailed proposals for this site would be supported by appropriate technical work and mitigation measures which would demonstrate the acceptability of the proposed new dwellings in this regard.</p> <p>Flood Risk</p> <p>In terms of flood risk considerations, the site is within Flood Zone 1 and is not at risk of flooding.</p> <p>Site Constraints</p> <p>Having regard to the above, we do not consider that there are any constraints associated with this site which would prevent residential development occurring. Approximately 10 to 12 flats, or a smaller number of houses could be acceptably accommodated on the site, having regard to the identified constraints, and thus the site is regarded as suitable for such development.</p> <p>Conclusions</p> <p>It is apparent from reading the Council's Issues and Options and Schedule of Site Appraisal consultation documents that the Borough will have a much higher housing requirement in the new Local Plan. From a sustainability point of view, further residential development in or near to Hemel Hempstead will need to be an important component. Our client's site can make a contribution to addressing the housing requirement.</p> <p>The land at Ridgeway Close site fails to fulfil the purposes of the Green Belt and should be removed. Consequently, it is capable of making a useful contribution towards the delivery of housing within the Borough in the next five years, providing an opportunity to create new homes in this suitable and sustainable location.</p>
Include files	sue Foster Bevangrace Ltd - response letter and maps.pdf
Number	Question 46
ID	LPIO21850
Full Name	Mrs Claire Madden
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Following an unwelcome move by the Parish Council who were in consultation with the landowner of site WA/8 (as identified in the Strategic Housing Land availability Assessment 2016) the village were finally invited to a

meeting to discuss the development in November 2015. Quite frankly they were met with a hostile response. The Parish Council had met with Dacorum without the knowledge of the village and without a remit. Currently Flamstead is one of the most protected villages in Hertfordshire ie the village is a small village in the green belt. The current local plan makes reference to small scale infill development which is limited to a handful of houses. The idea of a Neighbourhood Plan was put forward by the Parish. In response a comprehensive survey of the village residents was undertaken by an independent working party who represented a cross section of the village. The results of the survey dated August 2016 are attached. There were 450 respondents. The result of the survey Q3 shows 68% against development and 6% don't know only 26% were supportive.

There are a number of concerns with the current sites under consideration:

- 1 The village is surrounded by green belt. If sites are allocated in the green belt it makes a mockery of the policy. Where do you stop?
- 2 Flamstead's infrastructure is insufficient for future development of any scale. For years we have campaigned for better access to the A5. The road has now been downgraded following the opening of junction 11a for HGV routes but exiting onto the road has not improved. You take your life in your hands when turning right onto this road. The lanes from the village to Hemel Hempstead / Redbourn / Markyate are single track and dangerous as drivers speed around them.
- 3 The school takes only 15 pupils per year and teaches across 2 year groups in classes of 30+. Children in the village are not guaranteed a place in Flamstead village school and as a consequence are allocated places in Harpenden and Gaddesden Row schools.
- 4 The sites will generate more traffic in a village which already struggles with speeding traffic and congestion in the High Street.
- 5 The residents of Flamstead choose to live in a small village. If we wanted to live in a large village or town we would have done so. Dacorum should provide a variety of places for people to live.
- 6 The sites are not obvious housing sites and the allocation of sites will substantial increase their value. Individuals will benefit from a windfall to the detriment of the village.

Turing to the land specifically behind my home – WA/8 (Land South of Trowley Heights, Flamstead)

- 1 Friendless Lane is a side road with cars parked along it on a regular basis (my neighbour does not have vehicular access to his property). This narrows the road to a single track lane which is difficult for dustbin lorries, deliveries and farm vehicles. Additional traffic on such a road is not

	<p>practical or safe. Past Trowley Heights the road is single track only.</p> <ol style="list-style-type: none"> 2 There is no vehicular access to the site, it is land locked. Access could be via the current public car park which although under the management of the Parish Council is not owned by them. This car park is used daily by walkers and the users of the recreation ground. 3 The site is firmly in the green belt and development with block views to the adjacent Area of Outstanding Natural Beauty. 4 There are public footpaths across the site which are well used. <p>Hopefully Dacorum will note the strength of feeling in the village in response to these proposals. I trust you will take this into account when considering these sites against more obvious site for development elsewhere in Dacorum and neighbours boroughs.</p>
Include files	Claire Madden - Flamstead-Future-Survey-final-report-and-recommendations.pdf
Number	Question 46
ID	LPIO21852
Full Name	Pennard Holdings
Company / Organisation	PENNARD HOLDINGS
Position	
Agent Name	Peter Atkin
Company / Organisation	Pegasus Group
Position	Principal Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • Land north of Singlets Lane, Flamstead • Land west of Delmer End Lane • These Representations have been prepared by Pegasus Group on behalf of Pennard Holdings Ltd in respect of land at Flamstead. Specifically, the land promoted comprises two separate sites hereafter referred to as: <ul style="list-style-type: none"> • Land north of Singlets Lane; and • Land west of Delmer End Lane • The Representations are submitted in response to the current Regulation 18 consultation by Dacorum Borough Council (DBC) on the 'Local Plan Issues and Options' (November 2017) which seeks to identify the key strategic vision for the Borough in the period 2013 -2036 • The purpose of these Representations is primarily to respond to questions raised within the Issues & Options consultation in respect of the amount and distribution of new development within the Borough and seeks to set out the case for a revision to the Green Belt boundary to exclude the above mentioned sites at Flamstead from the Green Belt, alongside the provision of a site-specific policy that

allocates the sites for residential development in the new Local Plan

- The sites at Flamstead are deliverable (suitable, available and viable) within the new Local Plan period and offer the opportunity to accommodate high-quality developments of up to 80 new homes (total), comprising approx. 30 dwellings at the Singlets Lane site and approx. 50 dwellings at the Delmer End Lane site. The site at Singlets Lane is deliverable in the short term (0-5 years), whilst the site at Delmer End Lane is considered to be deliverable in the medium term (6-10 years).
- These Representations demonstrate that exceptional circumstances exist to justify a revision to the Green Belt boundary and subsequent allocation for residential development at Flamstead, as summarised below:

i) The strategic policy framework:

- Local Plans should identify (allocate) a supply of specific developable sites to meet objectively assessed needs;
- In preparing a new Local Plan, it is appropriate to consider revisions to the Green Belt consistent with the objectives of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the 'exceptional circumstances' test;

ii) The following development needs exist

- The new Local Plan should identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's housing needs as proposed under 'Option 3' of the Issues & Options consultation (i.e. 25,300 net additional homes in the period 2013-2036) in line with the Government's proposed standardised methodology for calculating housing need and anticipated changes to national planning policy;
- In the event that the Government's proposed standardised methodology should not come into effect as anticipated, the new Local Plan should as a 'fall-back' position, identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's objectively assessed housing needs as proposed under 'Option 2' of the consultation (i.e. 17,338 net additional homes in the period 2013-2036) as far as consistent with the NPPF;
- Insufficient non-Green Belt sites exist to meet housing needs in full and therefore it is appropriate to identify additional deliverable and sustainable Green Belt sites to contribute towards identified housing need;
- DBC is unable to demonstrate a 5-year housing land supply as required by the NPPF and accordingly, the new Local Plan should identify an additional supply of land from suitable and sustainable Green Belt sites (to make up this existing shortfall) to come forward in the early part

of the plan period, in order to deliver the Council's sustainable development objectives; and

- It is not appropriate for DBC to rely on the 'Duty to Cooperate' as neighbouring Local Authorities are either similarly highly constrained by Green Belt, are already making provisions to accommodate unmet needs of other authorities or are unable to meet their own needs

iii) The sites are able to contribute towards identified housing needs on the following grounds:

- Green Belt matters:
- Where the Green Belt is identified as not meeting NPPF purposes, it is appropriate to review the Green Belt through the Local Plan process;
- Flamstead makes a limited contribution to the purposes of the Green Belt and it is therefore appropriate for Flamstead to be 'inset' from the Green Belt; and
- The sites make a limited contribution to the purposes of the Green Belt and therefore the release of the sites would not give rise to significant 'harm' in Green Belt policy terms
- The sites are deliverable on the following grounds:
- The sites are suitable for development in terms of:
 - Sustainable location;
 - Access and highways;
 - Landscape/townscape;
 - Flood risk;
 - Ecology;
 - Heritage; and
 - Social infrastructure
- The sites are available; and
- The sites are viable.

iv) Procedural considerations:

- The Local Plan-making process provides the appropriate mechanism for reviewing the boundary of the Green Belt where this promotes sustainable patterns of development and exceptional circumstances apply;
- Following the removal of the site from the Green Belt, it is appropriate to 'backfill' with the inclusion of a 'Housing Allocation' in the new Local Plan (as opposed to subsequent Site Allocation documents) to avoid a policy vacuum.

v) Exceptional Circumstances:

- The combination of the above factors is considered to warrant the 'exceptional circumstances' necessary to justify the release of the sites from the Green Belt to deliver the much-needed new homes DBC needs and to contribute towards the sustainable development objectives for the borough, balanced with the need to protect the Green Belt where the Green Belt meets its stated purposes;
- The new Local Plan should support the sustainable distribution of development across the borough according to the settlement hierarchy to ensure the future vitality and viability of the borough's

towns and villages as a whole and provide future Green Belt boundaries that will endure.

- In response to the matters raised in the Issues and Options consultation, these Representations are structured as follows:
- **Section 2** describes the site and its surrounding context;
- **Section 3** considers the strategic policy context;
- **Section 4** outlines the housing need case;
- **Section 5** considers Green Belt matters;
- **Section 6** considers the site's deliverability;
- **Section 7** summarises the procedural considerations;
- **Section 8** considers the implications of the proposed local plan approaches;
- **Section 9** concludes the report and presents the development

1 SITE AND SURROUNDINGS

- The sites subject to these Representations comprise the following parcels of land within single ownership:
 - Land north of Singlets Lane; and
 - Land west of Delmere End Lane
- Land at Singlets Lane extends to approx. 1.5ha, with a potential developable area of 1ha (approx. 30 dwellings) and the site at Delmer End Lane extends to approx. 2ha, with a potential developable area of 1.6ha (approx. 50 dwellings). Red Line plans defining the sites are enclosed at Appendix 1
- Flamstead is situated to the north-east region of the administrative area of Dacorum Borough, just west of the M1 and within close proximity to Hemel Hempstead (approx. 5km to the south); Luton (approx. 6km to the north); St Albans (approx. 9km to the south-east); Harpenden (approx. 4km to the east); Markyate (1.7km to the north-west); and Redbourn (approx. 2.4km to the south-east) as shown in Figure 1 below (see attached)

Figure 1: Flamstead in Context within Borough of Dacorum and Neighbouring Authorities

Further afield, the centre of London is located approx. 40km (25 miles) to the south-east and Luton Airport is located approx. 8km (5 miles) to the north-east. The administrative area of St Albans District is situated to the east of the site, approximately in line with the M1 motorway

- The sites are located towards the eastern end of Flamstead in Hertfordshire as shown in Figure 2 (see attached)

Figure 2: The Sites in Context with Flamstead

- Dacorum is a predominantly rural borough, with approximately 85% of the borough comprising rural land, and approximately 60% of the borough designated as Green Belt1. The sites are located within the Metropolitan Green Belt and comprise of managed arable agricultural land

- Taking each site in turn, the Singlets Lane site is bordered directly by the existing built extent of Flamstead village to the south and east; to the west by allotments and to the north by agricultural land and tree nursery further beyond
- The site at Delmer End Lane is bordered directly by the existing built extent of Flamstead village to the west; by an existing hedgerow and trees to the north with a vacant field, with residential properties and a cemetery beyond; a small area of deciduous woodland to the east with Delmer End Lane beyond and agricultural land (open countryside) to the south

1 Issues & Options Consultation (November 2017)

Table 1 below provides a summary of local Planning Policy designations (Appendix 2), Environmental and Heritage constraints (Appendix 3) and Flood Risk considerations (Appendix 4) of relevance to the future development potential of the site

Table 1: Site Characteristics

Characteristic

Details

Existing Use

Land at Singlets Lane:

- Managed arable agricultural land

Land at Delmer End:

- Managed arable agricultural land

Green Belt

Yes (Flamstead is 'washed over' by Green Belt)

Neighbouring land uses

Land at Singlets Lane:

- Allotments and Flamstead village centre to west;
- Agricultural to north;
- Residential to east; and
- Residential to south.

Land at Delmer End:

- Residential to west;
- Residential abandoned field to north, with cemetery and residential properties beyond;
- Woodland to east; and
- Agricultural land / Countryside to south

Flood Zone

Land at Singlets Lane:

- Flood Zone 1 (lowest risk of flooding and therefore sequentially preferable)

Land at Delmer End:

- Flood Zone 1 (lowest risk of flooding and therefore sequentially preferable)

Public Rights of Way

Land at Singlets Lane:

- PROW abuts a small part of the western boundary of the site

Land at Delmer End:

- PROW runs along the northern and western boundary of the site.

Area of Outstanding Natural Beauty (AONB)

Land at Singlets Lane:

- No (the Chilterns AONB lies approximately 360m to the west)

Land at Delmer End:

- No (the Chilterns AONB lies approximately 450m to the west)

Contamination

No

Conservation Area

Land at Singlets Lane:

- No (the north-western corner of the site abuts the Flamstead Conservation Area)

Land at Delmer End:

- No (the north-western corner of the site lies approximately 80m east of the Flamstead Conservation Area)

Listed Buildings

Land at Singlets Lane:

- No (a Grade II Listed lodge building lies approx. 65m to the south-west of the site)

Land at Delmer End:

- No (a Grade II Listed former farmhouse lies approx. 50m south-east of the site, with several Grade II Listed Buildings located beyond)

Area of Archaeological Significance

Land at Singlets Lane:

- No (the north-western corner of the site abuts the Flamstead Area of Archaeological Significance)

Land at Delmer End:

- No (the western boundary of the site abuts the Flamstead Area of Archaeological Significance)

Scheduled Monument

No

Historic Parks & Gardens

No

World Heritage Site

No

Sites of Special Scientific Interest (SSSI)

Land at Singlets Lane:

- No (the Ashridge Commons and Woods SSSI and Chilterns Beechwood SAC located approx. 8.8km to the southwest from the site (at the closest point), Dunstable and Whipsnade Downs SSSI located approx. 8.5km to the northwest (at the closest point) and Kensworth Chalk Pit SSSI located approx. 6.7km northwest of the site (at the closest point))

Land at Delmer End:

- No (the Ashridge Commons and Woods SSSI and Chilterns Beechwood SAC located approx. 8.7km to the southwest from the site (at the closest point), Dunstable and Whipsnade Downs SSSI located approx. 8.7km to the northwest (at the closest point) and Kensworth Chalk Pit SSSI located approx. 7.1km northwest of the site (at the closest point))

National / Local Nature Reserve

No

RAMSAR Site

No

Special Area of Conservation

No

Special Protection Area

No

Site of Nature Conservation Importance

No

- As identified by Table 1 above, the sites at Flamstead are relatively unconstrained, save for the Green Belt policy designation

SITE DELIVERABILITY

- Critical to the case for development at this site is demonstrating deliverability in order to confirm that the site is capable of contributing towards the borough's identified development needs
- The following therefore provides a 'high-level' review of the deliverability of the sites at Flamstead

Site Suitability

Access and Highways

1 Land at Singlets Lane:

- The site benefits from its location immediately to the north of Singlets Lane, with an existing vehicular access point from Singlets Lane. Pedestrian connectivity is also available via a PROW which runs adjacent to the western edge of the site. Furthermore, the site is within walking distance of the village centre (approx. 200m) and five bus routes providing services to nearby higher order settlements, local schools and St Albans railway station

ii) Land at Delmer End Lane:

- Pedestrian connectivity is available via two PROWs which run along the northern and western boundaries of the site. Delmer End Lane is located in close proximity to the site and negotiations are ongoing with third parties regarding vehicular access. However, this is not considered insurmountable. Furthermore, the site is similarly located within walking distance of the village centre (approx. 80m), which offers five bus routes providing services to higher order settlements, local schools and St Albans railway station.

Landscape and Townscape

- The accompanying 'Analysis of Landscape & Visual Constraints and Opportunities' (Appendix 5) demonstrates that each site can accommodate a sensitively designed residential scheme with only limited landscape and visual effects at a localised level and that such impacts can successfully be avoided or reduced through appropriate mitigation

Flood Risk

1 Land at Singlets Lane:

- The site is located within Flood Zone 1 (lowest risk of flooding) as defined by the Environment Agency and is therefore sequentially preferable and considered suitable in principle for residential development in flood risk terms
- Any future planning application at this site would need to be supported by a site- specific flood risk assessment and surface water drainage strategy, incorporating Sustainable Urban Drainage Systems (SUDS).

ii) Land at Delmer End Lane:

- As above, the site is located within Flood Zone 1 (lowest risk of flooding) and is therefore sequentially preferable and considered suitable in principle for residential development

Ecology

1 Land at Singlets Lane:

- The site is not subject to any statutory environmental/ecological designations, the nearest being Kensworth Chalk Pit SSSI located approx. 6.7km north-west of the site (at the closest point).

ii) Land at Delmere End Lane:

- Similarly, the site is not subject to any statutory environmental/ecological designations, the nearest being Kensworth Chalk Pit SSSI located approx. 7.1km northwest of the site (at the closest point).
- Accordingly, it is considered that there are no overriding ecological constraints at either site to restrict future residential development. Moreover, it is considered that the redevelopment of the sites could in fact deliver enhanced wildlife habitats and ecological corridors to improve the function of the sites as part of a wider ecological/Green Infrastructure network

Heritage

1 Land at Singlets Lane:

- The north-western corner of the site is located adjacent to but falls outside the Flamstead Conservation Area and Area of Archaeological Significance. A Grade II Listed lodge building is also situated approx. 65m to the south-west of the site. Accordingly, any development at the site would need to be sensitively designed to have due regard to these heritage assets, however their presence is not considered to be an insurmountable constraint to the principle of development at the site

ii) Land at Delmer End Lane:

- The site is located approx. 80m east of the Flamstead Conservation Area and adjacent to, but outside the designated Area of Archaeological Significance. The site does not contain any Listed Buildings or Scheduled Monuments, the nearest being a Grade II Listed former farmhouse located approx. 50m to the south-east. A Grade II Listed former farmhouse is located approx. 50m to south-east, with a number of Grade II Listed Buildings located beyond. Any development would similarly need to be sensitively designed to have due regard to these heritage assets, however their presence is not considered to be an insurmountable constraint to the principle of development at the site

Social Infrastructure and Sustainability

- The adopted DBC Core Strategy defines the Settlement Hierarchy where development is currently focused in the Borough. Flamstead falls within the lowest tier of settlements, being one of the “selected small villages in Green Belt and rural area”. Other such villages identified within this tier include Aldbury, Chipperfield, Long Marston, Potten End, Wigginton and Wilstone. The Core Strategy (2013) notes that some of these villages, including Flamstead, are identified as being very important for local services and facilities
- The sustainability credentials of Flamstead are considered to be much greater than those of the other villages within the same tier and the categorisation of Flamstead solely as a ‘small village in the Green Belt’ does not accurately portray its sustainability credentials in terms of the

settlement hierarchy. The DBC Settlement Hierarchy Study (2017) notes that the third-tier villages within the Green Belt (such as Flamstead) have populations ranging from 900-1,500 residents and they all provide a primary school. However, those within the Rural Area beyond the Green Belt only have populations ranging from 500-600 residents and only some have a primary school.

- The Settlement Hierarchy (2017) sets out that, as of the 2011 Census, Flamstead has a population of 1,088. Therefore, the population of Flamstead comprises one of the largest of the identified 'third tier' villages

Table 10: Comparison of Settlements (DBC Settlement Hierarchy Study (2017)) - PLEASE SEE ATTACHED

- Table 10 above comprises an extract from DBC's Settlement Hierarchy Study (2017) showing a matrix of the settlements within DBC and some of the local facilities and services they provide, together with their accessibility level.
- Of the seven 'third tier' settlements, Chipperfield scores highest with regard to the number of identified key services provided (seven key services), closely followed by Flamstead, Aldbury and Potten End (five key services each). However, it should be noted that Chipperfield, Aldbury and Potten End both rank lower on their 'accessibility audit' than Flamstead, being rated 'Poor', 'Low' and 'Low' respectively. By contrast Flamstead's accessibility is rated as 'Fair', the same as the rating for the second tier 'Large Village' settlements, with 'good' public transport access and reasonably close proximity to the nearest higher tier settlement of Harpenden. The other remaining 'third tier' settlements all score lower both in terms of the number of key services provided and transport accessibility.
- The Settlement Hierarchy (2017) demonstrates that Flamstead is well served by a range of shops, community facilities, a primary school, pubs and a Post Office. In addition, the village benefits from regular bus services which link Flamstead to the larger settlements of Markyate, St Albans, Harpenden, Redbourn, Wheathampstead, Hatfield, Hemel Hempstead, Dunstable and Luton. Flamstead is also accessible to the Strategic Road network, being located in close proximity to the M1, at the junction with the A5183, which makes it possible for local residents to draw on the larger settlements for wider retail and leisure offers.
- As such, Flamstead is considered to be a demonstrably more sustainable location when compared to the majority of other 'third tier' villages. As such, the Council's development strategy should recognise the high sustainable credentials of this 'small village' compared to others and its subsequent ability to accommodate

additional development to meet the borough's housing needs

Overall Site Suitability

- The above assessment highlights the opportunity presented by these sites to contribute towards the borough's housing needs. The suitability of the sites is recognised by DBC within the SHLAA whereby they are marked as 'suitable' and the assessment states for each5:

“The site is located within the Green Belt which may be suitable for development pending the findings of the Green Belt review and other technical work under the Single Local Plan.”

5 DBC SHLAA (April 2016) – Volume 2 – Site Schedules – WA/10 and WA/11

- In conclusion, the sites at Flamstead are demonstrated to be suitable for development, subject to the removal of the Green Belt designation, the case for which is presented above, and therefore present a key opportunity to contribute towards the borough's spatial objectives and identified development needs.

Site Availability

1 Land at Singlets Lane:

- The site is under a single ownership and comprises managed arable agricultural land on the eastern edge of Flamstead. There are no legal constraints to the availability of the land for development
- The landowner is willing to make the site available for development and is actively promoting the site through the emerging Local Plan. It is therefore anticipated that subject to the removal of the Green Belt designation, that the site may be available for development in years 0 - 5 of the new Local Plan

ii) Land at Delmer End Lane:

- As above, the site is under the same ownership as land at Singlets Lane and similarly comprises managed arable agricultural land on the eastern edge of Flamstead.
- The landowner is willing to make the site available for development and is actively promoting the site through the emerging Local Plan. In parallel with this, the landowner is negotiating vehicular access to the site via Delmer End Lane. It is therefore anticipated that subject to the removal of the Green Belt designation, that the site may be available for development in years 6 – 10 of the new Local Plan.

Site Viability

- The sites comprise managed arable agricultural land (i.e. 'Greenfield' land) and accordingly it is not anticipated that there will be any abnormal costs associated with the development of the sites as may be expected on previously developed ('Brownfield') land
- As such, it is to be acknowledged that both sites are wholly capable of delivering the Council's

policies, particularly with regards to Affordable Housing provision.

Conclusions – Implications for the New Local Plan

- The sites are suitable for residential development with no insurmountable environmental, heritage or technical constraints;
- The sites are located within sustainable locations, suitable to accommodate new development;
- The sites are available for development now and are being actively promoted by a willing landowner;
- Residential development is confirmed to be a viable opportunity at this site; and
- Accordingly, for the purposes of preparing the Local Plan, the sites should be treated as a deliverable source of housing land with an expectation of completions achievable as follows, subject to the removal of the Green Belt designation:
 - Singlets Lane: deliverable in years 0-5 of the new Local Plan; and
 - Delmer End Lane: deliverable in years 6-10 years of the new Local Plan
- These Representations are submitted on behalf of Pennard Holdings Ltd in support of land east of Flamstead; namely land north of Singlets Lane and land west of Delmer End Lane, in response to the current 'Issues & Options' consultation by DBC
- The purpose of these Representations is primarily to respond to questions raised within the Issues & Options consultation in respect of the amount and distribution of new development within the Borough and seeks to set out the case for a revision to the Green Belt boundary to exclude the above mentioned sites at Flamstead from the Green Belt, alongside the provision of a site-specific policy that allocates the sites for residential development in the new Local Plan
- The sites at Flamstead are deliverable (suitable, available and viable) within the plan period and offer the opportunity to accommodate high-quality developments of up to 80 new homes (total), comprising approx. 30 dwellings at the Singlets Lane site and approx. 50 dwellings at the Delmer End Lane site. The site at Singlets Lane is deliverable in the short term (0-5 years), and the site at land at Delmer End is considered to be deliverable in the medium term (6-10 years).
- These Representations demonstrate that exceptional circumstances exist to justify a revision to the Green Belt boundary and subsequent allocation for new homes at land east of Flamstead, as summarised below:

i) The strategic policy framework:

- Local Plans should identify (allocate) a supply of specific developable sites to meet objectively assessed needs;
- In preparing a new Local Plan, it is appropriate to consider revisions to the Green Belt consistent

with the objectives of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the 'exceptional circumstances' test;

ii) The following development needs exist:

- The new Local Plan should identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's housing needs as proposed under 'Option 3' (i.e. 25,300 net additional homes in the period 2013-2036) in line with the Government's proposed standardised methodology for calculating housing need and anticipated changes to national planning policy;
- In the event that the Government's proposed standardised methodology should not come into effect as anticipated, the new Local Plan should as a 'fall-back' position, identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's objectively assessed housing needs as proposed under 'Option 2' (i.e. 17,338 net additional homes in the period 2013-2036) as far as consistent with the NPPF
- Insufficient non-Green Belt sites exist to meet housing needs in full and therefore it is appropriate to identify additional deliverable and sustainable Green Belt sites to contribute towards identified housing need;
- DBC is unable to demonstrate a 5-year housing land supply as required by the NPPF and accordingly, the new Local Plan should identify an additional supply of land from suitable and sustainable Green Belt sites (to make up this existing shortfall) to come forward in the early part of the plan period, in order to deliver the Council's sustainable development objectives; and
- It is not appropriate for DBC to rely on the Duty to Cooperate as neighbouring Local Authorities are either similarly highly constrained by Green Belt, are already making provisions to accommodate unmet needs of other authorities or are unable to meet their own needs

iii) The sites are able to contribute towards identified housing needs on the following grounds:

- Green Belt matters:
- Where the Green Belt is identified as not meeting NPPF purposes, it is appropriate to review the Green Belt through the Local Plan process;
- Flamstead makes a limited contribution to the purposes of the Green Belt and it is therefore appropriate for Flamstead to be 'inset' from the Green Belt; and
- The sites make a limited contribution to the purposes of the Green Belt and therefore the release of the sites would not give rise to significant 'harm' in Green Belt policy
- The sites are deliverable on the following grounds:
- The sites are suitable for development in terms of:
- Sustainable location;

- Access and highways;
- Landscape/townscape;
- Flood risk;
- Ecology;
- Heritage; and
- Social infrastructure
- The sites are available; and
- The sites are viable.

iv) Procedural considerations:

- The Local Plan-making process provides the appropriate mechanism for reviewing the boundary of the Green Belt where this promotes sustainable patterns of development and exceptional circumstances apply;
- Following the removal of the site from the Green Belt, it is appropriate to 'backfill' with the inclusion of a 'Housing Allocation' in the new Local Plan (as opposed to subsequent Site Allocation documents) to avoid a policy vacuum

v) Exceptional Circumstances:

- The combination of the above factors is considered to warrant the 'exceptional circumstances' necessary to justify the release of the sites from the Green Belt to deliver the much-needed new homes DBC needs and to contribute towards the sustainable development objectives for the borough, balanced with the need to protect the Green Belt where the Green Belt meets its stated purposes;
- The new Local Plan should support the sustainable distribution of development across the borough according to the settlement hierarchy to enhance the future vitality and viability of the borough's towns and villages as a whole and provide future Green Belt boundaries that will endure.

The Opportunity

- In conclusion, the evidence presented within these Representations highlights the suitability of land to the east of Flamstead to deliver approximately 80 much needed new homes (i.e. approx. 30 dwellings at land north of Singlets Lane and approx. 50 dwellings at land west of Delmer End Lane), consistent with the policies of the NPPF
- The landowner is keen to work collaboratively with DBC and local stakeholders in the preparation of the new Local Plan to ensure a positive policy position for the sites is taken forward to deliver real benefits for the local community and the borough as a whole

Include files	Peter Atkin - Pennard Holdings - P16-0326_FINAL Dacorum Issues
Number	Question 46
ID	LPIO21853
Full Name	Pennard Holdings
Company / Organisation	PENNARD HOLDINGS
Position	

Agent Name	Peter Atkin
Company / Organisation	Pegasus Group
Position	Principal Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • Land north of Singlets Lane, Flamstead • Land west of Delmer End Lane • These Representations have been prepared by Pegasus Group on behalf of Pennard Holdings Ltd in respect of land at Flamstead. Specifically, the land promoted comprises two separate sites hereafter referred to as: <ul style="list-style-type: none"> • Land north of Singlets Lane; and • Land west of Delmer End Lane • The Representations are submitted in response to the current Regulation 18 consultation by Dacorum Borough Council (DBC) on the 'Local Plan Issues and Options' (November 2017) which seeks to identify the key strategic vision for the Borough in the period 2013 -2036 • The purpose of these Representations is primarily to respond to questions raised within the Issues & Options consultation in respect of the amount and distribution of new development within the Borough and seeks to set out the case for a revision to the Green Belt boundary to exclude the above mentioned sites at Flamstead from the Green Belt, alongside the provision of a site-specific policy that allocates the sites for residential development in the new Local Plan • The sites at Flamstead are deliverable (suitable, available and viable) within the new Local Plan period and offer the opportunity to accommodate high-quality developments of up to 80 new homes (total), comprising approx. 30 dwellings at the Singlets Lane site and approx. 50 dwellings at the Delmer End Lane site. The site at Singlets Lane is deliverable in the short term (0-5 years), whilst the site at Delmer End Lane is considered to be deliverable in the medium term (6-10 years). • These Representations demonstrate that exceptional circumstances exist to justify a revision to the Green Belt boundary and subsequent allocation for residential development at Flamstead, as summarised below: <ul style="list-style-type: none"> i) The strategic policy framework: <ul style="list-style-type: none"> • Local Plans should identify (allocate) a supply of specific developable sites to meet objectively assessed needs; • In preparing a new Local Plan, it is appropriate to consider revisions to the Green Belt consistent with the objectives of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the 'exceptional circumstances' test; ii) The following development needs exist

- The new Local Plan should identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's housing needs as proposed under 'Option 3' of the Issues & Options consultation (i.e. 25,300 net additional homes in the period 2013-2036) in line with the Government's proposed standardised methodology for calculating housing need and anticipated changes to national planning policy;
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- It is not appropriate for DBC to rely on the 'Duty to Cooperate' as neighbouring Local Authorities are either similarly highly constrained by Green Belt, are already making provisions to accommodate unmet needs of other authorities or are unable to meet their own needs

iii) The sites are able to contribute towards identified housing needs on the following grounds:

- Green Belt matters:
- Where the Green Belt is identified as not meeting NPPF purposes, it is appropriate to review the Green Belt through the Local Plan process;
- Flamstead makes a limited contribution to the purposes of the Green Belt and it is therefore appropriate for Flamstead to be 'inset' from the Green Belt; and
- The sites make a limited contribution to the purposes of the Green Belt and therefore the release of the sites would not give rise to significant 'harm' in Green Belt policy terms
- The sites are deliverable on the following grounds:
- The sites are suitable for development in terms of:
 - Sustainable location;
 - Access and highways;
 - Landscape/townscape;
 - Flood risk;
 - Ecology;

- Heritage; and
- Social infrastructure
- The sites are available; and
- The sites are viable.

iv) Procedural considerations:

- The Local Plan-making process provides the appropriate mechanism for reviewing the boundary of the Green Belt where this promotes sustainable patterns of development and exceptional circumstances apply;
- Following the removal of the site from the Green Belt, it is appropriate to ‘backfill’ with the inclusion of a ‘Housing Allocation’ in the new Local Plan (as opposed to subsequent Site Allocation documents) to avoid a policy vacuum.

v) Exceptional Circumstances:

- The combination of the above factors is considered to warrant the ‘exceptional circumstances’ necessary to justify the release of the sites from the Green Belt to deliver the much-needed new homes DBC needs and to contribute towards the sustainable development objectives for the borough, balanced with the need to protect the Green Belt where the Green Belt meets its stated purposes;
- The new Local Plan should support the sustainable distribution of development across the borough according to the settlement hierarchy to ensure the future vitality and viability of the borough’s towns and villages as a whole and provide future Green Belt boundaries that will endure.
- In response to the matters raised in the Issues and Options consultation, these Representations are structured as follows:
 - **Section 2** describes the site and its surrounding context;
 - **Section 3** considers the strategic policy context;
 - **Section 4** outlines the housing need case;
 - **Section 5** considers Green Belt matters;
 - **Section 6** considers the site’s deliverability;
 - **Section 7** summarises the procedural considerations;
 - **Section 8** considers the implications of the proposed local plan approaches;
 - **Section 9** concludes the report and presents the development

1 SITE AND SURROUNDINGS

- The sites subject to these Representations comprise the following parcels of land within single ownership:
 - Land north of Singlets Lane; and
 - Land west of Delmere End Lane
- Land at Singlets Lane extends to approx. 1.5ha, with a potential developable area of 1ha (approx. 30 dwellings) and the site at Delmer End Lane extends to approx. 2ha, with a potential developable area of 1.6ha (approx. 50 dwellings).

Red Line plans defining the sites are enclosed at Appendix 1

- Flamstead is situated to the north-east region of the administrative area of Dacorum Borough, just west of the M1 and within close proximity to Hemel Hempstead (approx. 5km to the south); Luton (approx. 6km to the north); St Albans (approx. 9km to the south-east); Harpenden (approx. 4km to the east); Markyate (1.7km to the north-west); and Redbourn (approx. 2.4km to the south-east) as shown in Figure 1 below (see attached)

Figure 1: Flamstead in Context within Borough of Dacorum and Neighbouring Authorities

Further afield, the centre of London is located approx. 40km (25 miles) to the south-east and Luton Airport is located approx. 8km (5 miles) to the north-east. The administrative area of St Albans District is situated to the east of the site, approximately in line with the M1 motorway

- The sites are located towards the eastern end of Flamstead in Hertfordshire as shown in Figure 2 (see attached)

Figure 2: The Sites in Context with Flamstead

- Dacorum is a predominantly rural borough, with approximately 85% of the borough comprising rural land, and approximately 60% of the borough designated as Green Belt1. The sites are located within the Metropolitan Green Belt and comprise of managed arable agricultural land
- Taking each site in turn, the Singlets Lane site is bordered directly by the existing built extent of Flamstead village to the south and east; to the west by allotments and to the north by agricultural land and tree nursery further beyond
- The site at Delmer End Lane is bordered directly by the existing built extent of Flamstead village to the west; by an existing hedgerow and trees to the north with a vacant field, with residential properties and a cemetery beyond; a small area of deciduous woodland to the east with Delmer End Lane beyond and agricultural land (open countryside) to the south

1 Issues & Options Consultation (November 2017)

Table 1 below provides a summary of local Planning Policy designations (Appendix 2), Environmental and Heritage constraints (Appendix 3) and Flood Risk considerations (Appendix 4) of relevance to the future development potential of the site

Table 1: Site Characteristics

Characteristic

Details

Existing Use

Land at Singlets Lane:

- Managed arable agricultural land

Land at Delmer End:

- Managed arable agricultural land
Green Belt

Yes (Flamstead is 'washed over' by Green Belt)

Neighbouring land uses

Land at Singlets Lane:

- Allotments and Flamstead village centre to west;
- Agricultural to north;
- Residential to east; and
- Residential to south.

Land at Delmer End:

- Residential to west;
- Residential abandoned field to north, with cemetery and residential properties beyond;
- Woodland to east; and
- Agricultural land / Countryside to south

Flood Zone

Land at Singlets Lane:

- Flood Zone 1 (lowest risk of flooding and therefore sequentially preferable)

Land at Delmer End:

- Flood Zone 1 (lowest risk of flooding and therefore sequentially preferable)

Public Rights of Way

Land at Singlets Lane:

- PROW abuts a small part of the western boundary of the site

Land at Delmer End:

- PROW runs along the northern and western boundary of the site.

Area of Outstanding Natural Beauty (AONB)

Land at Singlets Lane:

- No (the Chilterns AONB lies approximately 360m to the west)

Land at Delmer End:

- No (the Chilterns AONB lies approximately 450m to the west)

Contamination

No

Conservation Area

Land at Singlets Lane:

- No (the north-western corner of the site abuts the Flamstead Conservation Area)

Land at Delmer End:

- No (the north-western corner of the site lies approximately 80m east of the Flamstead Conservation Area)

Listed Buildings

Land at Singlets Lane:

- No (a Grade II Listed lodge building lies approx. 65m to the south-west of the site)

Land at Delmer End:

- No (a Grade II Listed former farmhouse lies approx. 50m south-east of the site, with several Grade II Listed Buildings located beyond)

Area of Archaeological Significance

Land at Singlets Lane:

- No (the north-western corner of the site abuts the Flamstead Area of Archaeological Significance)

Land at Delmer End:

- No (the western boundary of the site abuts the Flamstead Area of Archaeological Significance)

Scheduled Monument

No

Historic Parks & Gardens

No

World Heritage Site

No

Sites of Special Scientific Interest (SSSI)

Land at Singlets Lane:

- No (the Ashridge Commons and Woods SSSI and Chilterns Beechwood SAC located approx. 8.8km to the southwest from the site (at the closest point), Dunstable and Whipsnade Downs SSSI located approx. 8.5km to the northwest (at the closest point) and Kensworth Chalk Pit SSSI located approx. 6.7km northwest of the site (at the closest point))

Land at Delmer End:

· No (the Ashridge Commons and Woods SSSI and Chilterns Beechwood SAC located approx. 8.7km to the southwest from the site (at the closest point), Dunstable and Whipsnade Downs SSSI located approx. 8.7km to the northwest (at the closest point) and Kensworth Chalk Pit SSSI located approx. 7.1km northwest of the site (at the closest point))

National / Local Nature Reserve

No

RAMSAR Site

No

Special Area of Conservation

No

Special Protection Area

No

Site of Nature Conservation Importance

No

- As identified by Table 1 above, the sites at Flamstead are relatively unconstrained, save for the Green Belt policy designation

SITE DELIVERABILITY

- Critical to the case for development at this site is demonstrating deliverability in order to confirm that the site is capable of contributing towards the borough's identified development needs
- The following therefore provides a 'high-level' review of the deliverability of the sites at Flamstead

Site Suitability

Access and Highways

1 Land at Singlets Lane:

- The site benefits from its location immediately to the north of Singlets Lane, with an existing vehicular access point from Singlets Lane. Pedestrian connectivity is also available via a PROW which runs adjacent to the western edge of the site. Furthermore, the site is within walking distance of the village centre (approx. 200m) and five bus routes providing services to nearby higher order settlements, local schools and St Albans railway station

ii) Land at Delmer End Lane:

- Pedestrian connectivity is available via two PROWs which run along the northern and western boundaries of the site. Delmer End Lane is located in close proximity to the site and negotiations are ongoing with third parties regarding vehicular access. However, this is not considered insurmountable. Furthermore, the site is similarly located within walking distance of the village centre (approx. 80m), which offers five bus routes providing services to higher order settlements, local schools and St Albans railway station.

Landscape and Townscape

- The accompanying 'Analysis of Landscape & Visual Constraints and Opportunities' (Appendix

5) demonstrates that each site can accommodate a sensitively designed residential scheme with only limited landscape and visual effects at a localised level and that such impacts can successfully be avoided or reduced through appropriate mitigation

Flood Risk

1 Land at Singlets Lane:

- The site is located within Flood Zone 1 (lowest risk of flooding) as defined by the Environment Agency and is therefore sequentially preferable and considered suitable in principle for residential development in flood risk terms
- Any future planning application at this site would need to be supported by a site-specific flood risk assessment and surface water drainage strategy, incorporating Sustainable Urban Drainage Systems (SUDS).

ii) Land at Delmer End Lane:

- As above, the site is located within Flood Zone 1 (lowest risk of flooding) and is therefore sequentially preferable and considered suitable in principle for residential development

Ecology

1 Land at Singlets Lane:

- The site is not subject to any statutory environmental/ecological designations, the nearest being Kensworth Chalk Pit SSSI located approx. 6.7km north-west of the site (at the closest point).

ii) Land at Delmere End Lane:

- Similarly, the site is not subject to any statutory environmental/ecological designations, the nearest being Kensworth Chalk Pit SSSI located approx. 7.1km northwest of the site (at the closest point).
- Accordingly, it is considered that there are no overriding ecological constraints at either site to restrict future residential development. Moreover, it is considered that the redevelopment of the sites could in fact deliver enhanced wildlife habitats and ecological corridors to improve the function of the sites as part of a wider ecological/Green Infrastructure network

Heritage

1 Land at Singlets Lane:

- The north-western corner of the site is located adjacent to but falls outside the Flamstead Conservation Area and Area of Archaeological Significance. A Grade II Listed lodge building is also situated approx. 65m to the south-west of the site. Accordingly, any development at the site would need to be sensitively designed to have due regard to these heritage assets, however their presence is not considered to be an insurmountable constraint to the principle of development at the site

ii) Land at Delmer End Lane:

- The site is located approx. 80m east of the Flamstead Conservation Area and adjacent to, but outside the designated Area of Archaeological Significance. The site does not contain any Listed Buildings or Scheduled Monuments, the nearest being a Grade II Listed former farmhouse located approx. 50m to the south-east. A Grade II Listed former farmhouse is located approx. 50m to south-east, with a number of Grade II Listed Buildings located beyond. Any development would similarly need to be sensitively designed to have due regard to these heritage assets, however their presence is not considered to be an insurmountable constraint to the principle of development at the site

Social Infrastructure and Sustainability

- The adopted DBC Core Strategy defines the Settlement Hierarchy where development is currently focused in the Borough. Flamstead falls within the lowest tier of settlements, being one of the “selected small villages in Green Belt and rural area”. Other such villages identified within this tier include Aldbury, Chipperfield, Long Marston, Potten End, Wigginton and Wilstone. The Core Strategy (2013) notes that some of these villages, including Flamstead, are identified as being very important for local services and facilities
- The sustainability credentials of Flamstead are considered to be much greater than those of the other villages within the same tier and the categorisation of Flamstead solely as a ‘small village in the Green Belt’ does not accurately portray its sustainability credentials in terms of the settlement hierarchy. The DBC Settlement Hierarchy Study (2017) notes that the third-tier villages within the Green Belt (such as Flamstead) have populations ranging from 900-1,500 residents and they all provide a primary school. However, those within the Rural Area beyond the Green Belt only have populations ranging from 500-600 residents and only some have a primary school.
- The Settlement Hierarchy (2017) sets out that, as of the 2011 Census, Flamstead has a population of 1,088. Therefore, the population of Flamstead comprises one of the largest of the identified ‘third tier’ villages

Table 10: Comparison of Settlements (DBC Settlement Hierarchy Study (2017)) - PLEASE SEE ATTACHED

- Table 10 above comprises an extract from DBC’s Settlement Hierarchy Study (2017) showing a matrix of the settlements within DBC and some of the local facilities and services they provide, together with their accessibility level.
- Of the seven ‘third tier’ settlements, Chipperfield scores highest with regard to the number of identified key services provided (seven key services), closely followed by Flamstead, Aldbury

and Potten End (five key services each). However, it should be noted that Chipperfield, Aldbury and Potten End both rank lower on their 'accessibility audit' than Flamstead, being rated 'Poor', 'Low' and 'Low' respectively. By contrast Flamstead's accessibility is rated as 'Fair', the same as the rating for the second tier 'Large Village' settlements, with 'good' public transport access and reasonably close proximity to the nearest higher tier settlement of Harpenden. The other remaining 'third tier' settlements all score lower both in terms of the number of key services provided and transport accessibility.

- The Settlement Hierarchy (2017) demonstrates that Flamstead is well served by a range of shops, community facilities, a primary school, pubs and a Post Office. In addition, the village benefits from regular bus services which link Flamstead to the larger settlements of Markyate, St Albans, Harpenden, Redbourn, Wheathampstead, Hatfield, Hemel Hempstead, Dunstable and Luton. Flamstead is also accessible to the Strategic Road network, being located in close proximity to the M1, at the junction with the A5183, which makes it possible for local residents to draw on the larger settlements for wider retail and leisure offers.
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Overall Site Suitability

- The above assessment highlights the opportunity presented by these sites to contribute towards the borough's housing needs. The suitability of the sites is recognised by DBC within the SHLAA whereby they are marked as 'suitable' and the assessment states for each⁵:

“The site is located within the Green Belt which may be suitable for development pending the findings of the Green Belt review and other technical work under the Single Local Plan.”

5 DBC SHLAA (April 2016) – Volume 2 – Site Schedules – WA/10 and WA/11

- In conclusion, the sites at Flamstead are demonstrated to be suitable for development, subject to the removal of the Green Belt designation, the case for which is presented above, and therefore present a key opportunity to contribute towards the borough's spatial objectives and identified development needs.

Site Availability

- 1 Land at Singlets Lane:
- The site is under a single ownership and comprises managed arable agricultural land on the eastern

edge of Flamstead. There are no legal constraints to the availability of the land for development

- The landowner is willing to make the site available for development and is actively promoting the site through the emerging Local Plan. It is therefore anticipated that subject to the removal of the Green Belt designation, that the site may be available for development in years 0 - 5 of the new Local Plan

ii) Land at Delmer End Lane:

- As above, the site is under the same ownership as land at Singlets Lane and similarly comprises managed arable agricultural land on the eastern edge of Flamstead.
- The landowner is willing to make the site available for development and is actively promoting the site through the emerging Local Plan. In parallel with this, the landowner is negotiating vehicular access to the site via Delmer End Lane. It is therefore anticipated that subject to the removal of the Green Belt designation, that the site may be available for development in years 6 – 10 of the new Local Plan.

Site Viability

- The sites comprise managed arable agricultural land (i.e. 'Greenfield' land) and accordingly it is not anticipated that there will be any abnormal costs associated with the development of the sites as may be expected on previously developed ('Brownfield') land
- As such, it is to be acknowledged that both sites are wholly capable of delivering the Council's policies, particularly with regards to Affordable Housing provision.

Conclusions – Implications for the New Local Plan

- The sites are suitable for residential development with no insurmountable environmental, heritage or technical constraints;
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 - Singlets Lane: deliverable in years 0-5 of the new Local Plan; and
 - Delmer End Lane: deliverable in years 6-10 years of the new Local Plan
- These Representations are submitted on behalf of Pennard Holdings Ltd in support of land east of Flamstead; namely land north of Singlets Lane and land west of Delmer End Lane, in response

to the current 'Issues & Options' consultation by DBC

- The purpose of these Representations is primarily to respond to questions raised within the Issues & Options consultation in respect of the amount and distribution of new development within the Borough and seeks to set out the case for a revision to the Green Belt boundary to exclude the above mentioned sites at Flamstead from the Green Belt, alongside the provision of a site-specific policy that allocates the sites for residential development in the new Local Plan
- The sites at Flamstead are deliverable (suitable, available and viable) within the plan period and offer the opportunity to accommodate high-quality developments of up to 80 new homes (total), comprising approx. 30 dwellings at the Singlets Lane site and approx. 50 dwellings at the Delmer End Lane site. The site at Singlets Lane is deliverable in the short term (0-5 years), and the site at land at Delmer End is considered to be deliverable in the medium term (6-10 years).
- These Representations demonstrate that exceptional circumstances exist to justify a revision to the Green Belt boundary and subsequent allocation for new homes at land east of Flamstead, as summarised below:

i) The strategic policy framework:

- Local Plans should identify (allocate) a supply of specific developable sites to meet objectively assessed needs;
- In preparing a new Local Plan, it is appropriate to consider revisions to the Green Belt consistent with the objectives of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the 'exceptional circumstances' test;

ii) The following development needs exist:

- The new Local Plan should identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's housing needs as proposed under 'Option 3' (i.e. 25,300 net additional homes in the period 2013-2036) in line with the Government's proposed standardised methodology for calculating housing need and anticipated changes to national planning policy;
- In the event that the Government's proposed standardised methodology should not come into effect as anticipated, the new Local Plan should as a 'fall-back' position, identify (allocate) a supply of specific developable sites (or broad locations for growth) to accommodate the borough's objectively assessed housing needs as proposed under 'Option 2' (i.e. 17,338 net additional homes in the period 2013-2036) as far as consistent with the NPPF
- Insufficient non-Green Belt sites exist to meet housing needs in full and therefore it is appropriate

to identify additional deliverable and sustainable Green Belt sites to contribute towards identified housing need;

- DBC is unable to demonstrate a 5-year housing land supply as required by the NPPF and accordingly, the new Local Plan should identify an additional supply of land from suitable and sustainable Green Belt sites (to make up this existing shortfall) to come forward in the early part of the plan period, in order to deliver the Council's sustainable development objectives; and
- It is not appropriate for DBC to rely on the Duty to Cooperate as neighbouring Local Authorities are either similarly highly constrained by Green Belt, are already making provisions to accommodate unmet needs of other authorities or are unable to meet their own needs

iii) The sites are able to contribute towards identified housing needs on the following grounds:

- Green Belt matters:
- Where the Green Belt is identified as not meeting NPPF purposes, it is appropriate to review the Green Belt through the Local Plan process;
- Flamstead makes a limited contribution to the purposes of the Green Belt and it is therefore appropriate for Flamstead to be 'inset' from the Green Belt; and
- The sites make a limited contribution to the purposes of the Green Belt and therefore the release of the sites would not give rise to significant 'harm' in Green Belt policy
- The sites are deliverable on the following grounds:
- The sites are suitable for development in terms of:
- Sustainable location;
- Access and highways;
- Landscape/townscape;
- Flood risk;
- Ecology;
- Heritage; and
- Social infrastructure
- The sites are available; and
- The sites are viable.

iv) Procedural considerations:

- The Local Plan-making process provides the appropriate mechanism for reviewing the boundary of the Green Belt where this promotes sustainable patterns of development and exceptional circumstances apply;
- Following the removal of the site from the Green Belt, it is appropriate to 'backfill' with the inclusion of a 'Housing Allocation' in the new Local Plan (as opposed to subsequent Site Allocation documents) to avoid a policy vacuum

v) Exceptional Circumstances:

- The combination of the above factors is considered to warrant the 'exceptional circumstances' necessary to justify the release of the sites from the Green Belt to deliver the much-needed new homes DBC needs and to contribute towards the

	<p>sustainable development objectives for the borough, balanced with the need to protect the Green Belt where the Green Belt meets its stated purposes;</p> <ul style="list-style-type: none"> The new Local Plan should support the sustainable distribution of development across the borough according to the settlement hierarchy to enhance the future vitality and viability of the borough's towns and villages as a whole and provide future Green Belt boundaries that will endure. <p><u>The Opportunity</u></p> <ul style="list-style-type: none"> In conclusion, the evidence presented within these Representations highlights the suitability of land to the east of Flamstead to deliver approximately 80 much needed new homes (i.e. approx. 30 dwellings at land north of Singlets Lane and approx. 50 dwellings at land west of Delmer End Lane), consistent with the policies of the NPPF The landowner is keen to work collaboratively with DBC and local stakeholders in the preparation of the new Local Plan to ensure a positive policy position for the sites is taken forward to deliver real benefits for the local community and the borough as a whole
Include files	Peter Atkin - Pennard Holdings - P16-0326_FINAL Dacorum Issues
Number	Question 46
ID	LPIO21858
Full Name	Fairfax Acquisitions Limited
Company / Organisation	Fairfax Classical Properties Ltd
Position	
Agent Name	Mr Tim Rodway
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>We represent Fairfax Acquisitions Limited, who have control of a strategic development land opportunity, located adjacent to the existing main settlement of Hemel Hempstead. For the purposes of the current Public Consultation, the site is known as 'North of Gadebridge', site reference HH-h2.</p> <p>The site has been promoted to the Council, and it has been confirmed via a range of technical survey work and assessments, that the site is suitable, available and deliverable. The site therefore has the ability to make a significant, and meaningful contribution to meeting the Borough Councils objectively assessed housing need (OAHN).</p> <p>A summary report, which provides specific technical details on site HH-h2's suitability to accommodate new development, is attached to these submissions. We</p>

would be grateful if this consultation representation could be read alongside this previously prepared document.

As stated above, on behalf of our clients we support the focus of new development being at the edges of the main settlement of Hemel Hempstead, specifically via the allocation and subsequent development of Site HH-h2 (North of Gadebridge).

Green Belt Considerations

With regards to the Green Belt designation, it is noted that the relevant site assessment for Site HH-h2 sets out that the Stage 2 Green Belt Review recommends excluding the site from further assessment. We request that this position be reviewed, given the identified lack of harm arising from the release of this site (including mitigation), the need for it to be released in terms of meeting OAHN, and the significant benefits its release would provide for, including economic, social and environmental benefits.

It is our case that the release of Site HH-h2 would not undermine the 5 “purposes” because:

- 1 Urban sprawl in this area is primarily contained by woodland and topographic constraints, which would be unaffected by this development;
- 2 There is no risk of the merging of Hemel Hempstead with other settlements because it is simply not possible for the gap between the settlements to be fully developed;
- 3 the overall land character of the area would be largely unchanged, although further development would help to consolidate and provide structure to the existing sporadic buildings in the area;
- 4 no historic town settings / characteristics would be affected;
- 5 releases of Green Belt land are necessary to fulfil housing requirements, since there is an insufficient supply of brownfield land. As such, urban regeneration objectives would not be compromised.

The NPPF is clear that Green Belt boundaries can only be altered through Local Plans, and only in exceptional circumstances. Whilst the Green Belt can be used to restrict development, it must ensure that the OAHN can be met.

Environmental Considerations

The scale of Green Belt development at Hemel Hempstead under Option 3 provides the opportunity for the provision of SANGs which would help to reduce recreational pressure on the Chilterns Beechwoods SAC.

The proposed distribution of new development in the Green Belt would provide growth at the edge of Hemel Hempstead, meaning that new Green Belt development would be located in proximity of the settlements with the most services, thereby reducing the need to travel and reducing the growth in greenhouse gas emissions.

Landscape Considerations

It is acknowledged that all the options proposed in the ‘Issues and Options’ consultation, which require the delivery of new housing on greenfield and Green Belt

land, will have some adverse effects on landscapes and townscapes. The loss of Green Belt land is considered a prerequisite of the Borough meeting their OAHN. We appreciate that the higher the level of housing the greater the potential there is for adverse effects on the local townscapes and landscapes, including adverse effects on the setting of the Chilterns AONB which lies close to the three main towns of Berkhamsted, Hemel Hempstead and Tring as well as to the west of Markyate.

New development would provide opportunities to improve the local townscape and public realm, particularly if the site is currently a poor contributor to the character of the local area. Amongst others the proposed Local Plan policies covering Landscape Character; The Chilterns Area of Outstanding Natural Beauty; Green Infrastructure; Public Rights of Way; Quality of Settlement and Neighbourhood Design; Quality of the Public Realm; and Height of buildings will help towards mitigating the effects of new development on the local landscapes and townscapes of those areas where new development will be focused.

Landscape assessments have been carried out by our clients in respect of Site HH-h2, and their summary is contained within the accompanying 'Initial Planning & Site Assessment' (December 2017) document. This sets out that 450 dwellings can be provided on site HH- h2 without significant impacts on landscape character.

Sustainability

The levels of development under the proposed options 2 and 3 could provide larger developments with increased scope for integrating new local services and facilities and increasing the viability of existing services. This would support this objective by reducing the need to travel to services.

Nevertheless, effects against this objective will be very dependent on the actual locations of new developments in relation to existing facilities and local infrastructure.

The proposed distribution of new development in the Green Belt under Option 2b includes all of the growth at the three main towns, meaning that new Green Belt development would be located in proximity of the settlements with the most services, thereby reducing the need to travel.

In any case, it is considered that the Local Plan policies covering Distribution of Development and Sustainable Transport will provide by mitigations by encouraging a reduction in the need to travel, through closer integration of housing, jobs and services as well as enabling and encouraging walking, cycling and the use of public transport.

Infrastructure

The development of site HH-h2 would encourage the possibility of regeneration of Gadebridge/ Galley Hill community/shopping area, which is located broadly to the west. The site would be provided with enhanced pedestrian and cycle links to this existing facility, and the additional footfall that would result from the increased population in this area would improve the vitality and viability of the facilities offered. In addition, the applicant

is committed to providing financial contributions specifically to regenerate these existing nearby services.

On-site provision for a bus loop can be incorporated, as well as the aforementioned cycle and pedestrian link improvements. The applicant is committed to providing a MUGA on-site, and would also consider the provision of other leisure facilities (for example, a skate park). There is also scope for other on-site community service provision, as well as contributions for off-site improvements.

Conclusions

In summary, Site HH-h2 could bring forward a significant number of dwellings in a sustainable location, adjacent to the major town of Hemel Hempstead, with access to key services, facilities, public transport and a significant economic base. With sensitive design, the site could be brought forward in a timely manner without adverse landscape impacts.

Likewise, development can be brought forward in a manner that preserves and enhances the setting of distant Listed Building's, and the Conservation Area to the east. The Scheduled Monument to the south and the area of Archaeological Significance can be managed and mitigated by way of the detailed development proposals.

In policy terms, this site is acceptable and offers a development opportunity which is deliverable and can make a valuable contribution towards housing provision in the Borough over the Plan period.

Given the OAHN, and the requirement to also take account of the unmet need of nearby authorities, we consider that Option 3 is the closest to being acceptable, as this offers the greatest potential levels of housing delivery. Whichever Option is chosen by the Council and progressed through the subsequent stages of the Local Plans preparation, what is clear is that it must include the allocation of sustainable greenfield sites. In this respect the land at Gadebridge is ideally positioned, and with the intention of delivering housing within the short term, tangible benefits will be provided not only in terms of assisting in meeting the Council's OAHN requirements, but also in terms of the community and infrastructure benefits that will come with the proposed quantum of development.

In conclusion, our client's site provides an excellent site for consideration in terms of housing delivery, as it would provide multiple housing and infrastructure benefits to the Borough well beyond the plan period as required by the NPPF, and opportunities of this nature will be required to fulfil OAHN.

A substantial amount of detail is required at the next consultation stage, and we will be providing further comments in due course.

Include files	Tim Rodway - Initial Planning and Site Assessment - Rev A - Dec 2017.pdf
Number	Question 46
ID	LPIO21980

Full Name	Mrs Diana Camden
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 object to all the proposed building in KINGS LANGLEY for the following reasons:</p> <p>Kings Langley is a special village with a special medieval history</p> <p>At present the village retains its character</p> <p>With the proposed Shendish development Kings Langley would be a continuation of Hemel</p> <p>Traffic is already a problem within Kings Langley with long queues morning and evening rush hours.</p> <p>There should be no building on any green belt land in or around Kings Langley as at present we have a good 'country feel'. The wildlife would be seriously affected if all the green spaces disappeared.</p> <p>Wayside Farm is needed as there are only two dairy farms in the area</p>
Include files	
Number	Question 46
ID	LPIO21990
Full Name	Waterside Way
Company / Organisation	Waterside Way Sustainable Planning Ltd
Position	
Agent Name	Mr Stephen Harris
Company / Organisation	Emery Planning Partnership
Position	Senior Consultant
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Section 10.8 (Key Site Options) sets out a list of sites being assessed. Our client's land is Tr-h6. We focus our response to Question 46 on this site specifically. We have also reviewed the assessment in the "Schedule of Site Appraisals (For Large Greenfield Sites)".</p> <ul style="list-style-type: none"> As the Council will be aware the site was promoted through the Dacorum Core Strategy. The Core Strategy, whilst it was found to be sound, was on the basis that there would be an early review due to the significant concerns by the Inspector on the housing requirement and the assessment of Green Belt sites. That is the process now being undertaken and we welcome the review of the plan. We are therefore continuing to pursue the allocation of the site through the process as we

consider it to be a logical extension to Tring to meet the town's existing and future housing needs.

- In summary it is proposed that the land is allocated for mixed use development including residential, leisure, recreational facilities and open space. The site has been subject to numerous environmental and technical studies and has been found to have no constraints, as confirmed in the Schedule of Site Appraisals. Therefore the site is clearly compliant with footnote 11 of the Framework and is a deliverable site. Whilst the site is owned by a consortium of landowners our client has all the necessary options in place to bring forward the site for development. It is available.

Site Location and Description

- The site is bounded by Icknield Way to the south, a footpath with residential development beyond to the east, the Wendover Arm of the Grand Union Canal to the north and Tring Corinthians Football Club to the west. We submit a site location plan and proposed illustrative masterplan alongside our representations. The area of the site is 8.75 ha and its current use is agricultural land on a tenanted basis
- The visual envelope of the Waterside Way site is restricted to the immediate surroundings with open views only obtainable from Icknield Way and the Grand Union Canal.

The Proposal

Residential

- The residential development is envisaged to provide a mix of housing types and a range of housing densities (i.e. between 30 – 50 homes per hectare). This could accommodate up to 300 dwellings although this figure is completely flexible at this stage and can be altered to reflect demand and need and we would welcome discussions with the local community and the Council on opportunities that the site can deliver. Two such opportunities are a proposed marina and playing pitches for the Tring Corinthians

Proposed Marina

- We consider that a marina development and associated leisure facility on a proportion of the site would accord with the national and local planning policies with regard to tourism and leisure development. As the council will appreciate, part of the Wendover Arm of the Grand Union Canal is currently dry; therefore, a marina at this location would increase the use of the Wendover Arm to the benefit of the local community and economy. The delivery of a mixed use development on the site may also enable the restoration of the remainder of the Wendover Arm.

Recreational Facilities

- The second key leisure element is the enhancement of the facilities at Tring Corinthians Football Club. The club's existing facilities consist of a football pitch with small changing rooms.

WWSPL has been in discussions with the football club with regard to their future aspirations and whether these aspirations can be met within the development. As a result of these discussions, the proposals incorporate an enhanced pitch, an additional training pitch, clubhouse and changing rooms, car parking and limited spectator facilities.

- In many new developments the open space provision is on the periphery of the development and functions as a subordinate element of the design. With Waterside Way a wholly different approach is being taken. The network of homes are organised by overlaying the open space provision within the interior rather than on the extremities of the proposed built form, thus creating an integrated green residential setting.
- The Schedule of Site Appraisals sets out the conclusion of the Stage 2 Green Belt Review. This is a point we raised previously and is set out again below.

Green Belt Review Stage 1

- Stage 1 was published in November 2013 and in our response dated 27th March 2015 we stated that Waterside Way must be considered in Stage 2 and must be considered as a standalone site as part of such a detailed assessment. If it is not then the process will be fundamentally flawed. At that stage it did not apply to just our client's site but also other parcels of land as Stage 1 had only undertaken a broad assessment of wider cells rather than assessing the merits of individual sites and their impact on the Green Belt.
- Our site was identified as part of wider GB02 cell in the Stage 1 Green Belt Review but that covered all the land to the north of Icknield Way. The extracts below are taken from Figures 7.1 to 7.5 of the Stage 1 study. These demonstrate that Cell GB02 compared favourably, if not better, than the two other cells within Tring. It was simply not possible to differentiate and therefore dismiss these cells, or part of them, when moving forward to Stage 2. (see attached)
- For the three cells the overall conclusions are:

GB02

GB03

GB04

NPPF Purpose 1

Limited or No Contribution

Limited or No Contribution

Limited or No Contribution

NPPF Purpose 2

Limited or No Contribution

Partial Contribution

Significant Contribution

NPPF Purpose 3

Significant Contribution

Partial Contribution

Significant Contribution

NPPF Purpose 4

Limited or No Contribution

Significant Contribution

Partial Contribution

Local Purpose

Limited or No Contribution

Limited or No Contribution

Limited or No Contribution

- In light of the above we questioned the exclusion of GB02 from being carried forward when it has “Limited or No Contribution” in 4 of the 5 categories when part of the cell (GB03) which is carried forward to Stage 2 had been assessed to have a greater impact than GB02 when taking all 5 categories together.

Stage 2

- In Stage 2 the site has again not been assessed individually but as part of a wider area (TR-A9) (see attached)
- The Stage 2 assessment makes the following conclusion
 - Purpose 1 - Limited / No Contribution – the parcel is located away from the large built-up areas of London, Luton and Dunstable and Stevenage
 - Purpose 2 - Limited / No Contribution – the parcel does not fully separate neighbouring 1st tier settlements
 - Purpose 3 - Significant – the parcel displays typical rural and countryside characteristics in arable fields with some pasture and a small block of woodland. There is very limited development apart from scattered farm buildings and large scattered single dwellings, and there is no significant encroachment. The north edge of Tring is the main urbanising influence, with a strong and linear settlement boundary defined by the B488. Beyond the edge of the settlement is a sewage works at Tringford Road.
- Therefore the key issue at Stage 2 for TR-A9 was Purpose 3. However Tr-h6 is only a part of that wider parcel and therefore the conclusions at Stage 2 cannot be applied going forward. This needs to be rectified if any weight is to be given to those conclusions
- We now set out our position.
- When reviewing Green Belt boundaries, the test in the Framework is to use “*physical features that are readily recognisable and likely to be permanent*”. However Waterside Way is wholly self-contained by the Wendover Arm of the Grand Union Canal to the north, and clearly influenced by existing residential development to the east and

the development to the south and Tring Corinthians to the west.

- It is considered that Green Belt releases to north of Tring would not result in a conflict with paragraph 80 of the Framework which sets out the five purposes of including land in Green Belts. The release of Waterside Way would not result in the unrestricted sprawl of large built up areas. It would also not prevent neighbouring towns from merging into one another.
- The third criterion is to assist in safeguarding the countryside from encroachment and the fifth criterion is to assist in urban regeneration. The Council accepts that Green Belt land will be required and encroachment of the countryside will be a consequence of meeting Tring's housing need.
- The fourth criterion is to preserve the setting and special character of historic towns. The landscape and visual assessment of the Waterside Way site (which has been shared with the LPA previously) states that the site is seen as being within the setting of the town and its development would not harm the town's setting.
- A Landscape and Visual Assessment has been undertaken for the site and previously submitted to the Council during the Core Strategy process. It is enclosed with these representations. The conclusions stated:

"Landscape Character

The Site's topography, proximity to Tring's suburbs and separation from the Chilterns AONB to the north by the Grand Union Canal result in a close association between the Site and the urban form of Tring rather than that of the wider countryside to the west and north.

Due to the Site's sloping topography, association with Tring and separation by the Grand Union Canal it is not considered to be integral to the setting of the Chilterns AONB to the north, which is distinctly different in character to that of the Site

Visual

The visual envelope is restricted to the immediate environs of the Site. Open views of the Site are only obtainable from Icknield Way (B488) abutting the southern boundary and from a short stretch of the Grand Union Canal Walk (within the AONB) abutting the north-eastern boundary

The undulating topography and mature hedgerow lining Little Tring Road to the west of the Site limit views from the wider countryside, whilst views into the Site from the east are screened by the built form of Tring's suburbs and vegetation.

Intervening woodland and treebelts to the north limit views from within the Chilterns AONB immediately to the north.

The Site becomes indiscernible in long distance views from the Chilterns AONB to the south and east, blending amongst the urban form and woodland within the valley

For the reasons outlined above, the Site is therefore considered to be an acceptable location for development at Tring on landscape and visual grounds. Guiding principles have been prepared from a landscape perspective to aid the assimilation of potential development on the site into the existing landscape context ”

- Therefore, the visual envelope of the Waterside Way site is restricted to the immediate surroundings with open views only obtainable from Icknield Way and the Grand Union Canal. The site when viewed from the foothills of the Chilterns AONB (Photoviewpoint 12 from the LVIA) is not visible; well concealed by the urban context and surrounding vegetation.
- Waterside Way is an appropriate site for release as it would not conflict with the criterion in the Framework and rolling the boundary back to the Wendover Arm would ensure that the new boundary is one that will endure, as required by paragraph 85 of the

Agricultural Land Quality

- The Schedule of Site Appraisals states that the site is Grade 2 agricultural land. However we have previously undertaken and submitted a report by Waterman which confirms that the site is 2.7ha of Grade 3a and 6 ha of Grade 3B. Therefore 62.5% of the site is not best and most versatile agricultural land. The report is enclosed.

Conclusion

- We consider that the site is a logical and sustainable location for residential and leisure development. It has been found to have no significant heritage, flood risk, contamination or ecological constraints and is a logical Green Belt release. The site is not subject to any constraints relating to ownership or access, and is deliverable. It should therefore be included in the Local Plan allocations on this basis.

Include files	Stephen Emery - Maps - Representations to Dacorum Local Plan Issues and Options to 2036.pdf
Number	Question 46
ID	LPIO22001
Full Name	Mr Paul Phipps
Company / Organisation	Whiteacre Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Yes. Our comments relate specifically to Grange Farm in Bovingdon, and are broken down into the following aspects:

Comparison with the core strategy

In response to the Core Strategy prepared in 2012 we prepared a masterplan which showed that Grange Farm can accommodate the requirements for Bovingdon which were set out in that document, being:

- 130 new homes
- Nursing Home
- Open Space
- Early years education facilities
- Allotments requested by the Parish Council

In doing so, we artificially limited the amount of proposed housing to just 130 new homes, since that was the amount of housing required from Bovingdon within the Core Strategy. The masterplan shows a low average development density and large areas of the site remained undeveloped.

Now that the housing requirement for Bovingdon will increase from 130 dwellings to as much as 450, those artificial restraints can be relaxed, to make better use of the site.

Site Capacity and Area

The new housing needs evidence within the Issues and Options document envisage up to 450 new homes will be required for Bovingdon, and not just 130 dwellings. Grange Farm could therefore now be developed at a density which is no longer artificially limited to just 130 new homes. We have prepared indicative masterplans showing that between 200 and 250 new homes could be provided at Grange Farm, in addition to many of the facilities listed in the previous page.

The developable site area can also be increased from that which was shown on the earlier masterplan, to incorporate all of the land identified in the council's Site Appraisal plan, as well as other adjacent land; which would have no detrimental impact on the Green Belt, were it to be developed.

We are therefore confident that Grange Farm could comfortably deliver 250 new homes, for the reasons set out above.

Green Belt Boundary

We therefore suggest that the Green Belt boundary to site Bov-h1 (Grange Farm) can be revised. The new boundary should abut the hard and defensible line of Green Lane and not the boundary noted on Site Appraisal form. We suggest that the new Green Belt boundary should be revised as shown in the ARUP Green Belt Review plan (their Ref No BV-A6)

Land Uses and Local Infrastructure

We understand that local residents will wish to address current infrastructure deficits in Bovingdon. These include perceived pressure on doctors' surgeries, the need to expand the primary school and provide pre-school education capacity, as well as the needs which were previously identified in the Core Strategy and listed above.

Grange Farm is of sufficient size to be able to address those pressing needs, providing new facilities to meet these important infrastructure requirements. The site

can not only provide the infrastructure required to serve the proposed new homes, but will also make a tangible contribution to overcoming existing infrastructure deficits in Bovingdon.

The council will be aware that discussions have been held with a retirement housing specialist, and that Grange Farm could accommodate either mainstream housing (both open market and affordable) or specialist housing to meet the needs of the elderly. It is envisaged that further work, including the outcome of the current consultation exercise itself, will help to apprise the best form of residential use to which the site should be put.

Impact on the High Street

We know that local residents are concerned that the High Street is already congested, which could lead to resistance to development at the Eastern end of Bovingdon. Grange Farm lies to the West of Bovingdon and thus has very little impact on this important issue. Other 'housing option' sites would be likely to exacerbate that problem, whereas the development of Grange Farm will not give rise to local resistance relating to High Street congestion.

Indeed, if the current school site were to be partially or fully relocated onto Grange Farm, then one of the main causes of High Street congestion would be permanently removed to a less congested part of the village. Subject to establishing the detailed land requirements, we are open to exploring ways in which part of the Grange Farm site could be made available to provide that important public benefit.

Flood Alleviation

We know that residents are concerned that existing flooding problems may be exacerbated by any large scale development in Bovingdon. Far from worsening this problem, the development of Grange Farm can incorporate well-designed features which have been proven to alleviate the current flooding issues in Bovingdon.

We attach copies of overland flow diagrams and drainage strategy designs for Grange Farm which show how existing floodwater flows will be intercepted and attenuated, within the proposals for Grange Farm.

At present, floodwater can travel unconstrained from West to East across the undeveloped Grange Farm fields, allowing residential areas to the East to suffer from surface water flooding. The attached designs show that the development of Grange Farm can incorporate flood water management features which will capture those flows, store excess surface water and create boreholes for percolation into the ground, before those flows can reach either the proposed development, or the rest of the settlement.

Those features have been modelled to the satisfaction of HCC to demonstrate that the flooding which has given rise to so much past local concern could be alleviated by the proposed development of Grange Farm.

Phasing

In relation to phasing, the Site Appraisal Document (Oct 2017) refers to Grange Farm Bovington as Site Bov-h1 for c 130 dwellings for delivery between 201/19 – 2021. We agree that this is a feasible use of the site and we have provided a masterplan to previous consultations (a copy is attached to this representation also), showing that amount of housing, as well as open space, allotments, an early years education facility and nursing home (all in line with the old Core Strategy requirements for Bovington, which have now been superseded).

As demonstrated above, Grange Farm has capacity to comfortably provide 200 to 250 homes as well as local facilities which we understand could be required (such as open space, a nursery, allotments and community facility).

The other large site Bov-h2, land SE of Homefield is noted for delivery 2029/30 – 2032. Whilst we do not generally support the slow release of housing sites, we can see that Bovington may uniquely require a staged approach, if the existing congestion of the High Street might be resolved through the development of educational facilities at Grange Farm, releasing highway capacity at this end of the village for the development of site Bov-h2 at a later stage. We therefore agree with this phasing.

Deliverability & Availability for Development

Finally, but most importantly, the immediate deliverability of Grange Farm for development is an important element of the Site Appraisals and the Sustainability Appraisal for this site.

The council's own previous assessment stated that *'as long as there is interest from the landowner there is no physical reason why this site could not be deliverable within the next 5 years'*. The promoters support that conclusion and the landowners are ready to release the site for housing immediately on the grant of planning consent.

The Site Appraisal shows housing could be delivered as early as 2018/19 and we agree with that assessment, for the reasons set out below:

The site has no significant constraint to its development. In their recent pre-application submission, the promoters have obtained extensive expert input from ecologists, landscape appraisal experts, archaeologists, engineers and solicitors. **Their work confirms that there are no physical, technical or legal constraints to the immediate development of Grange Farm for housing and other associated uses.**

It is our professional team's assessment that its development will not in any way prejudice or undermine the wider context of the Green Belt or the fundamental planning principles which land within the Green Belt should satisfy. This is a parcel of urban fringe land where development would simply round off the envelope to Bovington's urban area. The council's own Stage 2 Green Belt Assessment supports this conclusion.

The site has been actively promoted through the Core Strategy and Site Allocations processes, with extensive representations submitted in support of the residential

development of the land. This includes a very comprehensive pre-application submission, accompanied by an extensive suite of supporting reports and evidence. The main findings of those reports are summarised below:

- Access can be provided from adjacent adopted highways
- The site is sustainably located and can be accessed by a range of transport modes
- The visibility of the proposed development from the Green Belt has been considered at an early stage, and can be mitigated such that its impact is negligible
- The topography of the site presents no abnormal challenges to its development
- There are no large undevelopable areas relating to trees or
- There are no ponds or watercourses which could impede development
- The site is not within a flood risk zone. A solution to localised flooding is
- The underlying geology is suitable for development and sustainable surface water drainage
- Foul drainage can be achieved with minor off-site improvement works
- All mains services are available adjacent to the land
- There are no important wildlife or ecological features which might prevent development of the site
- The earlier masterplan leaves no doubt about the site's capacity and the development's ability to integrate with the landscape and the rest of the settlement

Furthermore there are no site ownership or legal constraints to the release of the land for development. The site is in one freehold ownership, with no leases. It is under option to an established developer. Vacant possession would be available on the entire site, immediately on the grant of a planning consent.

The site has a very low agricultural existing use value and is thus unconstrained by potential viability issues. It is therefore able to deliver the full policy-compliant range of planning gains (incl. 40% affordable housing) and necessary infrastructure to support its development, and make a full contribution to the settlement. The development of Grange Farm for housing is therefore not constrained by viability or economic factors.

There are no TPOs on this site. Only one tree would be lost to form the site access. The site is not contaminated. Nor is it a SSSI, LNR, SAC or other statutory designation. It does not involve the loss of open space. It could create up to 2.9 hectares of new open space. The site is not agriculturally productive and does not involve the loss of identified mineral resources.

This site is located on the edge of the settlement next to established housing of a similar density. It is within walking / cycling distance of a wide range of facilities, and is well connected to public transport.

	<p>Grange Farm is thus proven to have no abnormal constraints to its development of any kind.</p> <p>In short, Grange farm is sustainable, viable and fully deliverable. It can be made available for development.</p>
Include files	Stuart Oldroyd - EA SW Maps.pdf
Number	Question 46
ID	LPIO22002
Full Name	Mr Paul Phipps
Company / Organisation	Whiteacre Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes. Our comments relate specifically to Grange Farm in Bovingdon, and are broken down into the following aspects:</p> <p>Comparison with the core strategy</p> <p>In response to the Core Strategy prepared in 2012 we prepared a masterplan which showed that Grange Farm can accommodate the requirements for Bovingdon which were set out in that document, being:</p> <ul style="list-style-type: none"> • 130 new homes • Nursing Home • Open Space • Early years education facilities • Allotments requested by the Parish Council <p>In doing so, we artificially limited the amount of proposed housing to just 130 new homes, since that was the amount of housing required from Bovingdon within the Core Strategy. The masterplan shows a low average development density and large areas of the site remained undeveloped.</p> <p>Now that the housing requirement for Bovingdon will increase from 130 dwellings to as much as 450, those artificial restraints can be relaxed, to make better use of the site.</p> <p>Site Capacity and Area</p> <p>The new housing needs evidence within the Issues and Options document envisage up to 450 new homes will be required for Bovingdon, and not just 130 dwellings. Grange Farm could therefore now be developed at a density which is no longer artificially limited to just 130 new homes. We have prepared indicative masterplans showing that between 200 and 250 new homes could be provided at Grange Farm, in addition to many of the facilities listed in the previous page.</p> <p>The developable site area can also be increased from that which was shown on the earlier masterplan, to incorporate all of the land identified in the council's Site Appraisal plan, as well as other adjacent land; which</p>

would have no detrimental impact on the Green Belt, were it to be developed.

We are therefore confident that Grange Farm could comfortably deliver 250 new homes, for the reasons set out above.

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We therefore suggest that the Green Belt boundary to site Bov-h1 (Grange Farm) can be revised. The new boundary should abut the hard and defensible line of Green Lane and not the boundary noted on Site Appraisal form. We suggest that the new Green Belt boundary should be revised as shown in the ARUP Green Belt Review plan (their Ref No BV-A6)

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We understand that local residents will wish to address current infrastructure deficits in Bovingdon. These include perceived pressure on doctors' surgeries, the need to expand the primary school and provide pre-school education capacity, as well as the needs which were previously identified in the Core Strategy and listed above.

Grange Farm is of sufficient size to be able to address those pressing needs, providing new facilities to meet these important infrastructure requirements. The site can not only provide the infrastructure required to serve the proposed new homes, but will also make a tangible contribution to overcoming existing infrastructure deficits in Bovingdon.

The council will be aware that discussions have been held with a retirement housing specialist, and that Grange Farm could accommodate either mainstream housing (both open market and affordable) or specialist housing to meet the needs of the elderly. It is envisaged that further work, including the outcome of the current consultation exercise itself, will help to apprise the best form of residential use to which the site should be put.

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We know that local residents are concerned that the High Street is already congested, which could lead to resistance to development at the Eastern end of Bovingdon. Grange Farm lies to the West of Bovingdon and thus has very little impact on this important issue. Other 'housing option' sites would be likely to exacerbate that problem, whereas the development of Grange Farm will not give rise to local resistance relating to High Street congestion.

Indeed, if the current school site were to be partially or fully relocated onto Grange Farm, then one of the main causes of High Street congestion would be permanently removed to a less congested part of the village. Subject to establishing the detailed land requirements, we are open to exploring ways in which part of the Grange Farm site could be made available to provide that important public benefit.

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We know that residents are concerned that existing flooding problems may be exacerbated by any large scale development in Bovingdon. Far from worsening

this problem, the development of Grange Farm can incorporate well-designed features which have been proven to alleviate the current flooding issues in Bovingdon.

We attach copies of overland flow diagrams and drainage strategy designs for Grange Farm which show how existing floodwater flows will be intercepted and attenuated, within the proposals for Grange Farm.

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Those features have been modelled to the satisfaction of HCC to demonstrate that the flooding which has given rise to so much past local concern could be alleviated by the proposed development of Grange Farm.

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In relation to phasing, the Site Appraisal Document (Oct 2017) refers to Grange Farm Bovingdon as Site Bov-h1 for c 130 dwellings for delivery between 201/19 – 2021. We agree that this is a feasible use of the site and we have provided a masterplan to previous consultations (a copy is attached to this representation also), showing that amount of housing, as well as open space, allotments, an early years education facility and nursing home (all in line with the old Core Strategy requirements for Bovingdon, which have now been superseded).

As demonstrated above, Grange Farm has capacity to comfortably provide 200 to 250 homes as well as local facilities which we understand could be required (such as open space, a nursery, allotments and community facility).

The other large site Bov-h2, land SE of Homefield is noted for delivery 2029/30 – 2032. Whilst we do not generally support the slow release of housing sites, we can see that Bovingdon may uniquely require a staged approach, if the existing congestion of the High Street might be resolved through the development of educational facilities at Grange Farm, releasing highway capacity at this end of the village for the development of site Bov-h2 at a later stage. We therefore agree with this phasing.

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Finally, but most importantly, the immediate deliverability of Grange Farm for development is an important element of the Site Appraisals and the Sustainability Appraisal for this site.

The council's own previous assessment stated that *'as long as there is interest from the landowner there is no physical reason why this site could not be deliverable within the next 5 years'*. The promoters support that conclusion and the landowners are ready to release the

site for housing immediately on the grant of planning consent.

The Site Appraisal shows housing could be delivered as early as 2018/19 and we agree with that assessment, for the reasons set out below:

The site has no significant constraint to its development. In their recent pre-application submission, the promoters have obtained extensive expert input from ecologists, landscape appraisal experts, archaeologists, engineers and solicitors. **Their work confirms that there are no physical, technical or legal constraints to the immediate development of Grange Farm for housing and other associated uses.**

It is our professional team's assessment that its development will not in any way prejudice or undermine the wider context of the Green Belt or the fundamental planning principles which land within the Green Belt should satisfy. This is a parcel of urban fringe land where development would simply round off the envelope to Bovingdon's urban area. The council's own Stage 2 Green Belt Assessment supports this conclusion.

The site has been actively promoted through the Core Strategy and Site Allocations processes, with extensive representations submitted in support of the residential development of the land. This includes a very comprehensive pre-application submission, accompanied by an extensive suite of supporting reports and evidence. The main findings of those reports are summarised below:

- Access can be provided from adjacent adopted highways
- The site is sustainably located and can be accessed by a range of transport modes
- The visibility of the proposed development from the Green Belt has been considered at an early stage, and can be mitigated such that its impact is negligible
- The topography of the site presents no abnormal challenges to its development
- There are no large undevelopable areas relating to trees or
- There are no ponds or watercourses which could impede development
- The site is not within a flood risk zone. A solution to localised flooding is
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Include files	Stuart Oldroyd - S82670-SK-103 Post-Development Overland Flow.pdf
Number	Question 46
ID	LPIO22003
Full Name	Mr Paul Phipps
Company / Organisation	Whiteacre Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes. Our comments relate specifically to Grange Farm in Bovingdon, and are broken down into the following aspects:</p> <p>Comparison with the core strategy</p> <p>In response to the Core Strategy prepared in 2012 we prepared a masterplan which showed that Grange Farm can accommodate the requirements for Bovingdon which were set out in that document, being:</p> <ul style="list-style-type: none"> • 130 new homes • Nursing Home • Open Space • Early years education facilities • Allotments requested by the Parish Council

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Include files

[Stuart Oldroyd - S82670-SK-104 Outline Surface Water Drainage Strategy.pdf](#)

Number

Question 46

ID	LPIO22004
Full Name	Mr Paul Phipps
Company / Organisation	Whiteacre Ltd
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes. Our comments relate specifically to Grange Farm in Bovingdon, and are broken down into the following aspects:</p> <p>Comparison with the core strategy</p> <p>In response to the Core Strategy prepared in 2012 we prepared a masterplan which showed that Grange Farm can accommodate the requirements for Bovingdon which were set out in that document, being:</p> <ul style="list-style-type: none"> • 130 new homes • Nursing Home • Open Space • Early years education facilities • Allotments requested by the Parish Council <p>In doing so, we artificially limited the amount of proposed housing to just 130 new homes, since that was the amount of housing required from Bovingdon within the Core Strategy. The masterplan shows a low average development density and large areas of the site remained undeveloped.</p> <p>Now that the housing requirement for Bovingdon will increase from 130 dwellings to as much as 450, those artificial restraints can be relaxed, to make better use of the site.</p> <p>Site Capacity and Area</p> <p>The new housing needs evidence within the Issues and Options document envisage up to 450 new homes will be required for Bovingdon, and not just 130 dwellings. Grange Farm could therefore now be developed at a density which is no longer artificially limited to just 130 new homes. We have prepared indicative masterplans showing that between 200 and 250 new homes could be provided at Grange Farm, in addition to many of the facilities listed in the previous page.</p> <p>The developable site area can also be increased from that which was shown on the earlier masterplan, to incorporate all of the land identified in the council's Site Appraisal plan, as well as other adjacent land; which would have no detrimental impact on the Green Belt, were it to be developed.</p> <p>We are therefore confident that Grange Farm could comfortably deliver 250 new homes, for the reasons set out above.</p> <p>Green Belt Boundary</p> <p>We therefore suggest that the Green Belt boundary to site Bov-h1 (Grange Farm) can be revised. The new boundary should abut the hard and defensible line of</p>

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Include files	Stuart Oldroyd - Grange Farm - Option Extension Land - Plan - February 2018.pdf
Number	Question 46
ID	LPIO22009
Full Name	Millbank Land
Company / Organisation	Millbank Land
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Millbank Land is requesting that land at Bulbourne Road is allocated within the new Local Plan for residential development to contribute towards meeting Dacorum Borough's housing needs over the Local Plan period to 2036.</p> <p>These representations should be considered alongside the 'Call for Sites' form included in Appendix 1 which presents the most up-to-date details for the site and demonstrates that the site is deliverable, available, suitable and achievable in the short term; the Constraints Plan, Illustrative Masterplan Options included in Appendix 2; and the Sustainability Report included in Appendix 3.</p> <p>Key Characteristics of the Subject Site</p> <p>Land at Bulbourne Road ("the site") is a 1.4ha site, located to the north east of Tring and is approximately 1 mile from the town centre. The site is currently located just beyond the Tring settlement boundary as defined by the 2013 Core Strategy. The site is bound to the south by the residential properties on Tringford Road including Gamnel Mews and allotments to the rear of New Mill Social Centre and the Marmalade Cat Day Nursery. To the east, the site is bound by Bulbourne Road, the land to the east of the road is also in residential use. The land</p>

to the west is green field and extends to the Grand Union Canal. The land to the north of the site (Gamel Farm) benefits from planning permission¹ for four detached dwellings.

The site is relatively flat in character, primarily comprising of grass land however, a portion of the site is brownfield given there are existing buildings that are derelict adjoining the rear of the residential properties on Tringford Road. There is a right of way that crosses the site to provide access to adjoining land. Existing access is taken from both Tringford Road and Bulbourne Road (B488). The site falls entirely within Flood Zone 1 which is the Flood Zone at least risk of flooding. Furthermore, the site does not contain any heritage assets or scheduled ancient monuments. The site lies within the Green Belt and is bordered by the Chiltern Area of Outstanding Natural Beauty (AONB).

(1 Application Reference No. 4/02528/16/FUL)

Tring is defined a market town, providing a wide range of shops and community services for the local communities and surroundings. There are also a variety of employment areas that provide work opportunities. Tring railway station, which is located approximately two miles from the site, is on the West Coast Main Line and is served by London Midland and Southern services connecting it to Central London and north to Scotland.

The Land at Bulbourne Road, Tring is located within the designated Green Belt area of the Borough.

Notwithstanding this, the Council recognises that it will need to rely on more greenfield sites in the future in order to meet local housing needs, given that the Borough has limited brownfield capacity remaining and is predominantly rural in nature. Over three quarters of the land area in the Borough covered by an environmental designation. As a result, the Council should seek to identify the most sustainable sites to accommodate this development.

The part of the Green Belt within which the site is located, is not considered to play a role in preventing development that would result in the merging of, or significant erosion of the gap between neighbouring settlements. The wider parcel is considered to protect the openness of the countryside and is in the part of the Green Belt least covered by development. However, as described above, there are some existing derelict buildings on the site, it is bound on three sides by development and it represents a gap between two housing developments fronting onto Bulbourne Road. As a result development at this location could not be considered to constitute sprawl of the built up area of Tring and should be considered separately to the wider parcel that also falls within the Chiltern AONB.

Iceni has prepared a Sustainability Report (Appendix 3) using the Sustainable Development Scorecard⁸ to examine how closely the proposals conform with the NPPF's definition of sustainable development, taking account of economic, social and environmental considerations. The proposal achieved a sustainability score of 83% applying equal weight to each of the three pillars of sustainable development. In terms of the parity

score, which assesses how equally the three pillars are balanced, the proposal scored 85%. This demonstrates that the site would be a sustainable option for housing development. The sustainability performance of the site could be raised by progressing with an exemplar design that reflects the local context, character and density.

The site is suitable for development and is therefore developable. It is sustainably located within 1 mile of Tring town centre, providing a wide range of shops and services and community facilities to meet the needs of any new residents. The new population would support the vitality and viability of the centre and could contribute to the expansion of existing services or support the delivery of new facilities through appropriate development contributions. The site is served by a number of bus routes providing regular connectivity to the town centre and other key centres.

An illustrative masterplan has been prepared for the site (Appendix 2). This demonstrates that the site is capable of accommodating in the region of 36 units at a gross overall density of 26 dwellings per hectare (gross)/ 36 dwellings per hectare (net). This constitutes a relatively low development density in response to the setting of the site and the local context. The masterplan also includes an element of public open space that will form the heart of the development and will add recreation value for future residents. High quality landscaping would also help to minimise the impact of the development, particularly along the boundary with the AONB.

The site is considered to be deliverable, as it is available for development now; it is in the single control of Millbank Land, who are keen to progress with a residential development in the short-term. Initial appraisal work has not identified any barriers to delivery and the site is not dependent on any significant enabling infrastructure or development to take place before it can come forward for development.

To summarise, the Land at Bulbourne Road is deliverable, available, suitable and achievable and would represent a sustainable development that could contribute towards Dacorum's high and rising level of local housing need without significantly impacting on the role of the Green Belt.

8 <http://thescorecard.org.uk/>

Summary and Conclusions

On behalf of Millbank Land, we thank you for the opportunity to input into the Dacorum Local Plan Review.

In order to redress the shortcomings of the Core Strategy, the Council should seek to set a housing requirement that fully meets local housing need within the local authority area and potentially unmet needs from elsewhere. In order to accommodate the required housing growth, a comprehensive review of sites should be undertaken including the potential of sustainably located Green Belt sites.

As detailed above, Millbank Land is requesting the Council to allocate land at Bullbourne Road for housing development within the emerging Local Plan to 2036. The site, which does not perform a significant Green

	Belt role and is highly sustainable, it has the potential to contribute towards the Borough's housing requirement in a key settlement in the short term. Lower densities and appropriate exemplar design will ensure that the site relates to the rural character of the area, optimises its impacts and is compliant with policy objectives. We confirm that the site is deliverable, available, achievable and suitable for development in the short-term.
Include files	Jamie Stanley - Millbank Ltd - CFS Appencies
Number	Question 46
ID	LPIO22059
Full Name	Gallagher Estates
Company / Organisation	Gallagher Estates
Position	
Agent Name	Mrs Hanna Staton
Company / Organisation	Pegasus Group
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • This response supports the removal of site Tr-h3 (New Mill) from the Green Belt to enable its development for up to 400 homes. A Vision Document for the proposed development of the site has been submitted to the Council alongside these representations (Appendix C). • As acknowledged in the growth options carried forward by the Council in the Issues and Options document taken to Cabinet prior to the publication of the Standard Methodology, the removal from the Green Belt of land around Tring sufficient for the delivery of at least 1,000 homes was preferred and is likely to be required if the Borough's growth needs are to be met • The New Mill site is one of six Tring sites under consideration for removal from the Green Belt and allocation for housing development. Unlike three of these sites, New Mill was recommended for further consideration for removal from the Green Belt in the Stage 2 Green Belt Review. It is jointly the least sensitive of the Tring Green Belt sites in landscape terms and is not subject to overriding landscape, ecological, archaeological or heritage constraints. • It is considered that the form of this site represents the most natural extension to the town of Tring. Chapter 4 of the attached Vision Document demonstrates that the release of the site from the Green Belt would not compromise the five purposes of the Green Belt: the site is well contained, encroaching minimally into the countryside while maintaining a clear separation between Tring and nearby settlements and could provide a strong, defensible Green Belt boundary by rounding off the existing north-east development boundary. Its development would not compromise

the setting of Tring and would not prejudice the recycling of brownfield land.

- It is noted that the October 2017 version of the Issues and Options document put forward a Suggested Option, including a proposal to allocate land between Station Road and Bulbourne Road to the east of Tring for around 1,000 homes, new open space, a shop, accommodation for new healthcare facilities, with contributions expected towards Tring's infrastructure including a north / south link road, a new primary school and either expansion of the existing secondary school or provision of a new one. The updated Vision Document includes high level plans to show how this wider extension could come forward.
- Land at New Mill, Tring is located between Station Road and Bulbourne Road, as are sites Tr-h1 and Tr-h2. Of these sites, New Mill received the strongest support for removal from the Green Belt in the Stage 2 Green Belt Review and Landscape Appraisal, being located within the part of Green Belt sub-area TR-A2 that was considered "less constrained" and recommended for further assessment
- Whilst it is acknowledged that development of the site will put pressure on local infrastructure, this is equally the case for all of the sites reviewed by the Council and larger sites, such as New Mill have better prospects for delivering infrastructure, particularly should they be developed alongside neighbouring allocations, as could be the case with New Mill, Tr-h2 and Tr-h1.
- In response to the Schedule of Site Appraisals and specifically the site proforma for land at Icknield Way/ Grove Road also known as land at New Mill), which is referenced Tr-h3, comments are provided below.
- It would be helpful if the Council was to provide summary section whereby the quantum of homes for each settlement is listed in order to better understand the overall available capacity from these sites
- With regard to the proforma, the information contained is accurate. The majority of the information was recently provided as part of the Call for Sites consultation earlier in 2017
- The proforma states that with regard to ecology, key environmental designations are yet to be confirmed. As set out in the Vision Document, a preliminary Ecological View, including a Phase 1 Habitat Survey, has been obtained to establish the ecological opportunities and constraints of the development site. It has identified with regard to statutory designations that:
 - No statutory designations are located within or adjacent to the site. The nearest identified statutory designation to the site is the Tring Reservoirs Site of Special Scientific Interest (SSSI), located approximately 0.5km west of the site. This comprises of four artificial reservoirs fed by natural springs, with associated aquatic

	<p>and marginal vegetation. The designation is located adjacent to and is linked to the Grand Union Canal Walk</p> <ul style="list-style-type: none"> • The next nearest statutory designation is Pitstone Quarry SSSI, located approximately 1.2km north east of the site. The nearest European level designation is the Tring Woodlands SSSI component of Chiltern Beechwoods Special Area of Conservation (SAC), located approximately 2.1km south of the site • No non-statutory designations are present within or adjacent to the site. The nearest non-statutory designation is Dundale Local Wildlife site • No areas of designated ancient woodland are present within or adjacent to the site. • Further, with regard to infrastructure, the detail is yet to be confirmed. Again, as set out in the Vision Document additional infrastructure can be accommodated subject to further discussions with stakeholders and neighbouring land owners/ promoters. • Gallagher Estates will continue to undertake further work on the site to demonstrate its suitability, availability and achievability and this will be provided to the Council in due course.
Include files	Appendix C - Stuart Wells Gallagher Estates -office BIR.4712_IssuesandOptionsReps_FINAL_131217 APPENDIX C.pdf
Number	Question 46
ID	LPIO22060
Full Name	Unknown Unknown
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<i>Tring sites - Many Tring residents value Marshcroft Lane as the only local country lane in the area. It is enjoyed by many walkers, dog walkers and cyclists. It would be a great loss to the community if either of the two plans adjoining the lane were adopted. The value of such an amenity should be taken into account as part of the environmental assessment of each site. People need to walk in the countryside. It lifts the spirit!</i>
Include files	
Number	Question 46
ID	LPIO22062
Full Name	MCJ Trust
Company / Organisation	MCJ Trust
Position	

Agent Name	Samuel Dix
Company / Organisation	Smith Jenkins
Position	Senior Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>MCJ Trust controls a parcel of land around 1.6ha to the south of Flaunden. The land is presently agricultural in use although our client wishes to promote it for residential development in the forthcoming Local Plan. We would be grateful if the site could accordingly be entered into any future revision of the Council's Strategic Housing Land Availability Assessment.</p> <p>The site benefits from road frontage of around 60m at the centre of the village. This frontage is currently heavily overgrown with no field gate access or views into or out of the site. There are no rights of ways in or around the site and no known environmental constraints such as flooding or ecology.</p> <p>The site extends some 150m southwards from the road and could be developed as either a smaller 'in-fill' development along its road frontage to the north or as a more holistic development set back from the existing road.</p> <p>(Please see attached)</p>
Include files	Sam Dix - Appendix - completed site assessment proforma.pdf
Number	Question 46
ID	LPIO22063
Full Name	MCJ Trust
Company / Organisation	MCJ Trust
Position	
Agent Name	Samuel Dix
Company / Organisation	Smith Jenkins
Position	Senior Planner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>MCJ Trust controls a parcel of land around 1.6ha to the south of Flaunden. The land is presently agricultural in use although our client wishes to promote it for residential development in the forthcoming Local Plan. We would be grateful if the site could accordingly be entered into any future revision of the Council's Strategic Housing Land Availability Assessment.</p> <p>The site benefits from road frontage of around 60m at the centre of the village. This frontage is currently heavily overgrown with no field gate access or views into or out of the site. There are no rights of ways in or around the site and no known environmental constraints such as flooding or ecology.</p> <p>The site extends some 150m southwards from the road and could be developed as either a smaller 'in-fill' development along its road frontage to the north or as</p>

	a more holistic development set back from the existing road. (Please see attached)
Include files	Sam Dix - call-for-sites-proforma-2017-(pdf-38kb).pdf
Number	Question 46
ID	LPIO22088
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This site is highly constrained and should be reviewed as the development is likely to cause material harm to the surrounding environment and heritage assets.</p> <p><u>Green Belt and Green Gap loss.</u></p> <p>The proposal would see the gap between Hemel Hempstead and Rucklers Lane entirely closed and the gap between historic Kings Langley would be adversely narrowed.</p> <p>Rucklers Lane was built for workers on the nearby Shendish Manor estate. This area has a unique character with several mock Tudor houses. The area has few services but does have a community hall. The character of this area is rural with open space on either side of Rucklers Lane. The Stage 2 Green Belt Review concluded that this area of Green Belt only contributes to two out of the five Green Belt purposes. In the Green Belt Purposes Assessment Green Belt parcel GB14b was rated as having only a partial effect in preventing neighbouring towns from merging. The assessment states that: <i>'Any small-scale reduction in the gap would be unlikely to compromise the physical separation of 1st tier settlements but would reduce overall levels of visual openness.'</i> The assessment should have also considered the 2nd and 3rd settlements where there would be a significant effect on Rucklers Lane and Kings Langley merging into Hemel Hempstead.</p> <p><u>Valued Landscape</u></p> <p>The land at Shendish is a valued landscape well used by walkers and local people, and appreciated for the separation it provides between Kings Langley village from Hemel Hempstead.</p> <p><u>Harm to the Historic Environment</u></p> <p>The development of this site would have a significant effect on Apsley Manor Farmhouse and Shendish Manor even though these buildings are excluded from the identified development site. Both buildings are Grade II listed and the surroundings are part of their character. Shendish Manor is also a locally Registered Park and Garden. This site adjoins the listed curtilage and if</p>

brought forward for development would significantly impact on the Zone of Visual Influence. Dacorum's Schedule of Site Appraisals has not gone into enough detail on how these heritage assets will be affected by the proposed allocation and further development. Before this allocation is made it should be assessed against guidance set out in 'The setting of Heritage Assets - Historic Environment Good Practice Advice' in Planning Note 3.

Poor Access

The access to the site is currently very poor. It has been suggested that direct access onto London Road would be used plus a potentially new access from Rucklers Lane. Currently both these roads are very narrow and of poor quality. The level and impact of required improvement to the roads would need further scrutiny. The large-scale nature of this site means that if it were to be brought forward for development it would exert significant pressure on the local highway network. An assessment of potential access options should be undertaken before any further development is considered in this location to establish the impact of additional traffic on the capacity of the local highway and on the local environment.

The site also lies within an area of potential Archaeological significance. Ecology

Within the Schedule of Site Appraisals, it states that the ecological value is "to be confirmed". An Ecology Appraisal should be carried out before further consideration is given to the site's allocation to check whether there are any significant ecological factors likely to be affected. The site has extensive tree coverage which are protected by a Tree Protection Order. An arboriculture assessment should be carried out to assess the trees. This should be done before allocation, so an informed decision can be made about the potential harm to protected trees.

Groundwater Protection Zone

The allocation is within a Ground Water Protection Zone. Any development that takes place will have to consider measures to protect groundwater. The Precautionary Principle should be applied to determine whether this site is appropriate to be allocated and developed.

Public Right of Way

This site is constrained by three Public Right of Ways. These are:

- Kings Langley 017
- Kings Langley 018
- Kings Langley 019

KL&DRA object to the possible loss of these Public Right of Ways if the allocation is brought forwards. These Public Rights of Way are regularly used, and it would be harmful to the community if they were lost.

Dacorum Borough Local Plan 1991 – 2011 (Adopted 2004) – Inspector's Report – August 2002

Green Belt Policy was last reviewed at the Inquiry into the Dacorum Borough Local Plan 1991-2011 and his

conclusions set out in the Inspector's report, August 2002. Of particular note, the matter of whether land at Shendish should be released from the Green Belt was considered. The Inspector concluded at paragraph 4.34.14 that:

"In my view, the substantial damage that would be caused to the form and function of the Green Belt and the visual intrusion into the attractive open landscape on the southern valley side would more than outweigh any positive sustainability benefits that would be achieved through development of this site. For this reason, I do not consider that the site is a sustainable location for housing. I am not satisfied therefore that it would be a better housing location than any of the sites proposed in the Plan. Accordingly, I find that the circumstances are not sufficiently exceptional to warrant its release from the Green Belt. I recommend that no modification should be made to the Plan in response to objection 4807."

Furthermore, Shendish was also reviewed by the Inspector as an alternative housing allocation. In paragraph 7.59.45 that:

"I conclude that although the site would be well served by other modes of transport and well located in respect of most facilities and services it would not be sustainable overall because of the impact on the Green Belt and the setting of Shendish Manor. I find that it would set a precedent for further development to the south of the railway line and would have a damaging visual impact on the landscape of the Gade Valley. It would also significantly detract from the historical setting of

Shendish Manor and diminish the recreational value of the footpaths that pass through the site. It could also cause problems of congestion on London Road. I accept that the existing infrastructure could be expanded to accommodate the development and that it would bring some benefits, but I am not satisfied that these would outweigh the harm I believe it would cause. Consequently, I am not persuaded that the land at Shendish would be a preferable location for housing. Accordingly, I recommend that no modification should be made to the Plan in response to these objections."

The situation surrounding either the site or local context have not materially changed since the

Inspector's report such that a change to his overall conclusion should be made. There would be:

- Substantial damage to the form and function of the Green Belt in this location;
- A damaging visual intrusion into the attractive open landscape on the Gade Valley;
- It would significantly detract from the setting of Shendish manor;
- It would diminish the recreational value of the footpaths that pass through the site;
- It would cause problems of congestion on London Road and whilst improvements to the existing infrastructure could be made, these would not outweigh the harm it would cause as listed above;

	<ul style="list-style-type: none"> The site cannot be considered sustainable because harm would outweigh any positive sustainability benefits that would be achieved through development of the site; The circumstances are not sufficiently exceptional to warrant its release from the Green Belt. <p><u>QUESTION 46 HH-h3 Land at Shendish, London Road - Summary Representation and Response Sought:</u> Site HH-h3 Land at Shendish, London Road, is inappropriate for development for the reasons set out above.</p>
Include files	Jane Terry - REPS - Appendicies A B C - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Appendicies A B C.pdf
Number	Question 46
ID	LPIO22089
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Green Belt and greenfield land</u></p> <p>Development of this site would lead to the substantial loss of greenfield land and land within the Green Belt. Land around Hill Farm adjoins Kings Langley School and offers a special local character valuable to the local community.</p> <p>The site is located within Green Belt Parcel GB14B. The Green Belt is important to the protection of Kings Langley historical character and wider landscape setting. If this site was to come forward, then the site would have to be released from the Green Belt. Local authorities should only amend Green Belt boundaries when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:</p> <ul style="list-style-type: none"> making effective use of suitable brownfield sites and the opportunities offered by estate regeneration ;the potential offered by land which is currently underused, including surplus public-sector land where appropriate ;optimising the proposed density of development; and exploring whether other authorities can help to meet some of the identified development requirement.

Dacorum Borough Council has not explored the above options and therefore this greenfield site should not be released or allocated.

Infrastructure capacity

The transport infrastructure is at full capacity by KL&DRA and the potential development of this site would exacerbate this. The area is already very congested. The Schedule of Site Appraisals confirms that the impact on capacity of the local road network will need to be robustly assessed in terms of highway capacity, highway safety and safe routes to school. This should be completed before allocation of this site is considered, including a safety audit. In addition, KL&DRA disagree with the suggested access to the high street as there is already significant traffic issues on Langley Hill, Vicarage Lane, Common Lane and Coniston Road which lead down to the A4251. There needs to be careful consideration of transport issues in relation to this potential allocation site.

This site is located very close to three schools and is extremely busy at drop off and collection times. Hundreds of children use the very busy roads around the Hill Farm site to walk to school and any further increase in traffic could pose a serious risk to pedestrian safety at these busy times of day

Historic environment

This allocation will have an adverse impact on the Kings Langley Conservation Area and its surrounding setting. The allocation will also have an adverse impact on the listed buildings and their setting. Historical constraints are likely to have an impact on this allocation and future development. A historical appraisal of the site should be carried out in accordance with 'The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning Note 3' prepared by Historic England before any decision is made on allocation of this site.

Ecology

It is stated with in the Schedule that Ecology is to be confirmed. Ecology is likely to be an important factor in deciding whether this site should be allocated. The site is a greenfield site and therefore it is highly likely that there will be Ecological value to the site. A Desktop Study using MAGIC revealed there is likely to be these species on site:

- Lapwing
- Turtle Dove

As well as the above species, the site is designated a Source Protection Zone. An ecology appraisal should be carried out before a decision is made on allocation. This will reveal the scope for ecology on site.

QUESTION 46 KL-h1 Land at Hill Farm, Love Lane - Summary Representation and Response Sought:

Site KL-h1 Land at Hill Farm, Love lane is inappropriate for development

Include files

[Jane Terry - REPS - Appendicies A B C - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Appendicies A B C.pdf](#)

Number	Question 46
ID	LPIO22090
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The site at Rectory Farm consists of approximately 20 acres of farming land, including just over one acre of dilapidated farm buildings, located on the north side of Kings Langley. Access is via Gade Valley Close, which runs along the southern border. To the west the farm is bordered by Hempstead Road (A4251), and the Grand Union Canal runs along the eastern border. To the north are pitches owned by Kings Langley Football Club.</p> <p>Since 2014, Transition in Kings (TiK) has engaged local volunteers in producing vegetables for sale at the monthly Kings Langley Market. On a very small scale, this effort demonstrates the potential for a much larger and more efficient food producing business at Rectory Farm, possibly based on “pick- your-own” fruit and vegetables together with modern systems for producing year-round fresh vegetables.</p> <p>In addition, the Sunnyside Rural Trust at Hemel Hempstead has a track record of developing the life skills of people with learning disabilities through engaging in horticultural activities. By leasing 5-10 acres at Rectory Farm, the Trust would be able to expand their valuable community work in Kings Langley.</p> <p>Taking into consideration the need to make most effective use of available previously developed land, and the former and current uses of this site, it is considered that most effective use could be made of the brownfield element through redevelopment for housing, thus contributing towards the Borough’s housing needs. However, this forms only a small part of the larger Rectory Farm site which is used for agricultural purposes and allotments by the community. This element should be retained in open uses which are entirely appropriate to the Green Belt. Retention of the greenfield part of the site would also be significantly enhanced for community benefit through its identification as a strategic open space set aside for recreational use and creation of a riverside footpath.</p> <p>Contributions to facilitate these enhancements should be linked to any redevelopment of the brownfield element of Rectory Farm, set out as requirements through policy criteria.</p> <p><u>Ecology</u></p> <p>The land adjacent to the Grand Union Canal provides a rare undisturbed wildlife corridor approximately 0.5 km in length, supporting a variety of water birds including a</p>

kingfisher, herons, egrets, and more common moorhens, ducks and swans. A full wildlife audit should be undertaken to ensure there is no adverse impact on the habitats for these species. With carefully built access routes this area could provide invaluable resources for school nature studies and wildlife observation. Some trees on Rectory Farm have Tree Protection Orders.

Dacorum Borough Local Plan 1991 – 2011 (Adopted 2004) – Inspector’s Report – August 2002

Rectory Farm was also considered in the 2002 Local Plan Inspector’s report. The Council had previously allocated the land as a reserved housing site. However, through the Inquiry it was acknowledged that there was no longer any need for the land at Rectory Farm to be allocated or released for housing. The inspector concluded that:

“In reaching this conclusion, I have taken account of the fact that Rectory Farm would be well located in terms of its accessibility to local bus routes, schools and shops in the village centre. However, in the light of its impact on the Green Belt, on the character of the area and on the capacity of the local infrastructure I am not satisfied that it would constitute a more sustainable location for housing than any of the other greenfield housing proposal sites.”

It has long been acknowledged therefore, that the greenfield land at Rectory Farm makes a significant contribution to the Green Belt and should be protected as such.

The situation surrounding either the site or local context has not materially changed since the

Inspector’s report such that a change to his overall conclusion should be made. There would be an unacceptable impact on:

- The character of the area;
- The capacity of the local infrastructure.; and
- This area of the Green

Notwithstanding the above, it is recognised that the brownfield element of land at Rectory Farm does not have a positive impact on the Green Belt and could contribute towards the housing requirements of the Borough. Subject to limitation to the previously developed area, it is therefore accepted that the brownfield footprint of the site could be allocated for residential development. This would protect the greenfield element and minimise the impact on the Green Belt.

QUESTION 46 KL-h2 Land at Rectory Farm, Hempstead Road Summary Representation and Response Sought:

Site KL-h2 Land at Rectory Farm, Hempstead Road is inappropriate for development other than redevelopment of the brownfield footprint, for the reasons set out above. Any redevelopment of the brownfield footprint of Rectory Farm should be accompanied by appropriate criteria including the requirement for contributions for the enhancement of the residual green infrastructure for recreational use and creation of a riverside footpath.

Include files	Jane Terry - REPS - Appendicies A B C - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Appendicies A B C.pdf
Number	Question 46
ID	LPIO22091
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Green Belt</u></p> <p>The site is located within Green Belt Parcel GB14B. The Green Belt is important to the protection of Kings Langley historical character and wider landscape setting. If this site was to come forwards, then the site would have to be released from the Green Belt. For this to happen authorities should only amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:</p> <ul style="list-style-type: none"> • making effective use of suitable brownfield sites and the opportunities offered by estate regeneration • ;the potential offered by land which is currently underused, including surplus public-sector land where appropriate • ;optimising the proposed density of development; and • exploring whether other authorities can help to meet some of the identified development requirement. <p>Dacorum Borough Council has not explored the above options and therefore this greenfield / Green Belt site should not be released or allocated.</p> <p><u>Valued Landscape</u></p> <p>Wayside is a valued landscape that separates Kings Langley village from the M25 and A41.</p> <p><u>Historic Environment</u></p> <p>There are two designated areas of Archaeological Significance. One is north to the rear of Langley Hill and one to the east of Watford Road. Each of these areas contains a Scheduled Ancient Monument.</p> <p>Wayside Farm has historical significance. The top of the farm near to Rudolph Steiner School was once the location of Queen Eleanor's 13th century Palace.</p> <p>Historical constraints are likely to have an impact on this allocation and future development. A historical appraisal, if the site should be carried, should be carried out in accordance with The Setting of Heritage Assets – Historic Environment Good Practice Advice in Planning</p>

Note 3 by Historical England before any decision is made on allocation of this site.

Flood Zone 3

The Eastern edge of the smaller south-eastern parcel falls within Flood Zone 3. A Sequential Test should be carried out on this site as part of the site is in Flood Zone 3. A Sequential Test will provide an explanation of why this specific site has been chosen above other more suitable sites. Currently there is brownfield land within Kings Langley which could be more suitable for development.

Ecology

It is stated within the Schedule that ecology is to be confirmed. Ecology is likely to be an important factor in deciding whether this site should be allocated. The site is a greenfield site and therefore it is highly likely that there will be ecological value on the site. A Desktop Study using MAGIC revealed there is likely to be these species on site:

- Arable and Greenland Assemblage Farmland Birds
- Lapwing
- Tree Sparrow
- Turtle Dove
- Yellow Wagtail

As well as the above species, the site is designated a Woodland Priority Habitat Network. This is configuration of habitat that allows species to move and disperse through a landscape. If this site is allocated, then the Woodland Priority Habitat Network will be disturbed, and this will have a harmful impact on the local Ecology. An ecology appraisal should be carried out before a decision is made on allocation.

Inefficient land use

There is a lack of justification for building additional office space in Dacorum due to the number of vacant or under-used offices such as Maylands Industrial Estate in Hemel Hempstead. It is felt that office use on the Wayside Farm site would not be an efficient use of this land and therefore the site should not be allocated.

Public Right of Way

This site is constrained by three Public Right of Ways. These are

- Kings Langley 005
- Kings Langley 007
- Kings Langley 008

KL&DRA object to the possible loss of these Public Right of Ways if the allocation is brought forwards. These Public Rights of Way are regularly used, and it would be harmful to the community if they were lost.

QUESTION 46 KL-h3 Wayside Farm Summary Representation and Response Sought:

Site KL-h3 Land to the east of A41 and Wayside Farm, Watford Road is inappropriate for development.

Include files

[Jane Terry - REPS - Appendices A B C - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - Appendices A B C.pdf](#)

Number	Question 46
ID	LPIO22092
Full Name	Kings Langely & District Residents Association
Company / Organisation	Kings Langley and District Residents association
Position	
Agent Name	Jane Terry
Company / Organisation	Vail Williams
Position	Partner
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Other potential for developing brownfield land in preference to greenfield and Green Belt sites.</p> <p>The following are new sites.</p> <ul style="list-style-type: none"> • Skyline Roofing, The Nap WD4 8ES - builder's yard to the rear • Chiswell Pools, 126 Hempstead Rd, WD4 • Alpine Press, Station Rd, WD4 • A T Olivers, Home Park Works, WD4 8LW • Druglink, Trefoil House, Red Lion Lane, HP3 9TE • Red Lion Pub, Red Lion Lane, 56 London Road HP1 3BD • DBC garages in Barnes Rise WD4 8AN, Rucklers Lane, Waterside and Great Park • Pillings Volvo, 28 Rucklers Lane, WD4 8AU • Trade Link used cars, 20 Church Lane WD4 8JU • Chipperfield Garden Scene (garden centre), Chapel Croft, WD4 8EG • 167 London Road, Apsley, Hemel Hempstead, HP3 9SQ • 21 Bellgate, Hemel Hempstead, HP2 5SB • 2 Kimps Way, Hemel Hempstead, HP3 8EN • Charter Court, Kings Langley, WD4 9HR • 100 High Street, Hemel Hempstead, HP1 3AQ • Maylands Avenue, Hemel Hempstead • Former gasometer, London Road, HP3 9AB • 353 London Road, Hemel Hempstead • Hemel Hempstead Station • 27 Standring Rise, Hemel Hempstead • Link Road, Hemel Hempstead • Pennine Way, Hemel Hempstead • Former Buncefield Depot • Three Cherry Trees Lane, Hemel Hempstead Industrial Estate • Spencer's Park, Crown Land, North Hemel Hempstead • Westside, London Road, HP3 9TD • ASM Recycling, Railway Terrace, WD4 8JE • Gaywood Fishery, Station Footpath, WD4 8DZ • Kings Langley Building Supplies, Primrose Hill, WD4 8HR • Langley Wharf, Railway Terrace, WD4 8JE • Sunderlands Yard, Church Lane, WD4 8JU • BT Exchange, The Nap, WD4 8ET • Land at Runways Farm, Upper Bourne End Lane, Hemel Hempstead, HP1 2RR • 7- 9 High Street, Tring, HP23 5AH

	<p>A Map illustrating the location of each of the above sites is to be found at Appendix B.</p> <p>As referenced above, it is not considered that sufficient work has been undertaken to demonstrate that the contribution to delivering the Borough's housing needs cannot be carried out on brownfield land whether within the existing urban fabric or on previously developed land within the Green Belt. A simple exercise undertaken for Kings Langley and surrounding areas indicates 33 potential sites (see response to question 11) which would be more appropriate for development than the release of Green Belt land. These sites have an indicative potential yield significantly more than the level of development required under Option 1A.</p> <p>A more in-depth appraisal is likely to identify further sites not only in Kings Langley but also across the Borough, thus reducing the need for Green Belt releases. No further consideration of Green Belt releases should be made until a robust appraisal of all previously developed land has been undertaken across the Borough.</p> <p><u>QUESTION 46 Alternative Potential Brownfield Sites - Summary Representation and Response Sought:</u></p> <p>Further work is required to identify potential brownfield sites before further consideration is given to the release of any land for development within the Green Belt.</p>
Include files	APPENDIX B - Jane Terry - office REPS - Response to DBC Local Plan Issues and Options Consultation FINAL - Kings Langley - December 2017 v5 11.12.2017.pdf
Number	Question 46
ID	LPIO22115
Full Name	Crest Nicholson
Company / Organisation	
Position	
Agent Name	Sarah Moorhouse
Company / Organisation	Lichfields
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>See Section 4.0 of the Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum's New Local Plan: Issues and Options (Nov 2017) document by Lichfields on behalf of Crest Nicholson Chiltern.</p> <p>Whilst the evidence base to date emphasises the early stage that it is at and the extent of work to be undertaken we have fundamental concerns that key elements undertaken to date are not sound.</p> <p>This reflects the simplistic methodology, failure to fully consider, and then weigh, all appropriate matters and the reliance on some elements which are flawed. In addition DBC has not undertaken an assessment of the contribution that each potential development site makes to the purpose of the Green Belt.</p>

	The need for DBC to address and resolve these concerns within the evidence base, and subsequently within the subsequent iteration(s) of the Local Plan will be key factors in the Inspector's conclusions as to whether the Local Plan is sound. Our concerns also highlight the importance of subsequent stages of the evidence base, and emerging plan, being timely, robust and open to appropriate scrutiny and the programme for progressing the Local Plan should reflect this.
Include files	Sarah Moorhouse Crest Nicholson-15426 Land adj. to Blegberry Gdns, Berkhamsted Reps (13.12.17).PDF
Number	Question 46
ID	LPIO22160
Full Name	Mrs Hayley Gillard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Where no is identified in this document, I have not provided the reason why and will do when requested as part of the final consultation. Regards [handwritten signature]
Include files	
Number	Question 46
ID	LPIO22204
Full Name	Mr Peter Gillard
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 answered the questions as shown in the pages of this document. Where I have identified no to the questions raised I have not provided detailed information at this stage but will be happy to provide necessary detail to my responses when requested as part of the final close out to this consultation process. Regards [handwritten signature] Note the existing options put forward a very rigid in their structure with no opportunity to put forward other valid proposals. This could be based on a differing model for levels of build or numbers of houses built specific to type of area and need again one fits all approach is very rigid so based on current option above 2B (rest of comment illegible as is cut off the end of the scanned page).
Include files	

Number	Question 46
ID	LPIO22248
Full Name	Miss Sophie Gillard
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 feel that you are consulting too late with something as major as this I will give further updates to my views set out that you want clarification on as part of the ongoing consultation process the reason being that the source information given needs some extensive investigation prior to commenting</p> <p>Will provide feedback as part of ongoing consultation process</p>
Include files	
Number	Question 46
ID	LPIO22252
Full Name	Bruce Morris
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of</p>

Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

Impact on AONB and Sustainability

With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

“Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the

site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive

overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending

the boundary in view of the harm that would be caused to the openness of the wider Green Belt.

- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand

Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
- Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.
- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

Housing and Community Services Strategic Objective

	<ul style="list-style-type: none"> The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility). We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development. <p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22256
Full Name	Mr & Mrs Hutton
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be

removed from the list of sites to be taken forward to the next stage.

Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

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summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

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We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

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"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is

given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

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The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

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Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

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The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the

site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up

to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
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and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

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- The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).
- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO22260
Full Name	Mr & Mrs Gray
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainability</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.</p> <p>Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before</p>

any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this

document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

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Recommendations

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	payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22264
Full Name	Mr & Mrs Shaw
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainabiliy</u></p>

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It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

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In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of

the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives

as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

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"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

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Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
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- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

opens out and is not visually intrusive into the AONB.

- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents’ parking and its junction with Gravel Path.
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- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
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- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

	<p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22268
Full Name	Mr & Mrs Morris
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p>

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The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

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With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the

number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED] [REDACTED]

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Include files	
Number	Question 46
ID	LPIO22272
Full Name	Hassan & Caroline Farran & Jarrett
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted</p>

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It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be

easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison of [REDACTED] as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation

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"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

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We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

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The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

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characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

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- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from

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- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
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- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO22276
Full Name	Mr & Mrs de Lisle
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainabiliy</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.</p> <p>Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with</p>

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Include files	
Number	Question 46
ID	LPIO22280
Full Name	Adam & Ruth Trigg & Barrett
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainability</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the</p>

AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

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The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

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[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues

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I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances

I do not believe the site would be more suitable for release than any of the sites identified in the plan.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

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The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

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We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

opens out and is not visually intrusive into the AONB.

- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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Road Access

- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents’ parking and its junction with Gravel Path.
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junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

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Housing and Community Services Strategic Objective

- The Core Strategy has policies for a mix of housing and for 35% of new houses to be "affordable". These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).
- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

	<p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22284
Full Name	Mr & Mrs Henderson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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	<p>Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).</p> <ul style="list-style-type: none"> We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development. <p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22288
Full Name	Mr & Mrs McGregor
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted</p>

valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

Impact on AONB and Sustainability

With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be

easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation

from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe

characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from

frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
- Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6

vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

Housing and Community Services Strategic Objective

- The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).
- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO22292
Full Name	Mr& Mrs Adams
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainabiliy</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.</p> <p>Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with</p>

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- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow

and has parking on one side. These “pinch-points” in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

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- The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).
- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed

	below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22296
Full Name	Mr & Mrs Butcher
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainability</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the</p>

AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues

and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances

I do not believe the site would be more suitable for release than any of the sites identified in the plan.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

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"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to

schools, access to the A41 bypass and ability to enhance or provide public transport.

Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it

opens out and is not visually intrusive into the AONB.

- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents’ parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the

junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

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	<p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22300
Full Name	Emma & Elizabeth Pemberton
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p>

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- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
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Road Access

- As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not

provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
- Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.
- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

Housing and Community Services Strategic Objective

- The Core Strategy has policies for a mix of housing and for 35% of new houses to be "affordable". These policies are not deliverable at the Ivy House

	<p>Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).</p> <ul style="list-style-type: none"> We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development. <p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22304
Full Name	Mr & Mrs Ostle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Mr & Mrs Ostle:</p> <p>We have been resident [REDACTED].</p> <p>Berkhamsted is an old market town at the bottom of a fairly steep valley. As such routes of communication already result in very significant bottlenecks and congestion in the town centre. There is also severe shortage of reasonable parking space for residents, shoppers and commuters.</p> <p>The existing traffic congestion and the steep slopes on two sides of the town results in sub optimal air quality</p>

and noticeable traffic fumes at certain times of the day and climatic condition. This is detrimental to the people who work there as well as shoppers and children. There is already a shortage of doctors' surgeries, and schools are reportedly at capacity, and local hospital facilities have been significantly reduced.

There has already been a large increase in the number of residencies in Berkhamsted and a significant number more are already planned. Berkhamsted is well ahead of its 10 year building plan, whereas other areas of Dacorum are well below. It seems only right that these areas should catch up with their Programmes before extra requirements are forced on areas that have already done more than their proportionate share.

Comments relating to Be-h3 Ivy House Lane

We agree with learned views expressed by Neil Aitchison BSc FRICS, Sharon Van Vlymen, Philip Jones and Bruce Morris representing respectively the majority of all residents of Ivy House Lane, Meadway, Hunters Park and the bridletrack off Gravel Path commonly known as the Common.

Our very specific objections to development in this area are;

A] Greenbelt and AONB. The proposal would result in high density housing built on Greenbelt immediately adjoining an area of the Chiltern AONB. The conspicuous position of the proposed site at the head of a dry Chiltern Valley would result in considerable injury to the visual amenities of the Greenbelt and AONB which would appear to be in direct conflict with the Planning Policy Guidance, and Planning Inspectorates [DoE Bristol] findings since May 1991. Furthermore, the Council appear to have omitted to recognize the findings of their own Residential Area Character Study which identified that the area around this proposed Greenbelt site and adjoining AONB was characterised by low density detached housing, in essence producing the 'soft' boundary between urban and rural areas that the Council have pursued. There is no doubt that the proposal would also unacceptably harm the character and appearance of the whole area.

B] Scenic and rural surroundings and boundary. The surrounding area of rural undulating hills would be significantly and detrimentally affected and it would not be practical to avoid a hard boundary between the AONB and the proposed development. This is directly contrary to previous Dacorum Planning Depts stated objectives of maintaining a soft boundary between the urban development and the surrounding sensitive area. The Planning Dept have re-iterated this objective several times since the late 1980's up to recently, and it has been upheld by the National Planning Inspectorate of the DOE. Further References and related matter can be supplied – please advise if required.

C] Road Access. Ivy House Lane is generally a single carriageway lane and over a lot of its length either borders or runs through AONB. The road frequently gets into very bad condition, and has severe restrictions over the railway and canal bridges. Much of the road has been recently impassable for several days to all but

experienced drivers in proper 4x4 vehicles because of the steep slopes, snow and ice and assumed lack of access for ploughing or gritting. Significant improvement to Ivy House Lane will significantly affect the rural nature of this outermost boundary of the town and the AONB. Access to the proposed site from other directions, even if achievable, will all result in a very considerable increase in traffic on Gravel Path.

D] Traffic. Berkhamsted is already very congested, and Gravel Path, the crossroads at the top of Gravel Path, and the Potten End Road are particularly busy already, especially when people, deer and other wide life also widely use parts of the area. The unmade bridle path, traditionally known as the Common and also believed to be within the AONB, is already frequently used as a potentially dangerous rat run with drivers wanting to avoid delays at the cross roads. It will be difficult to improve either Gravel Path or the Potten End Road without significantly detracting from their rural nature and their softening of the urban and AONB boundaries. Even if the Potten End Road and crossroads were improved much traffic would have to use New Road which for much of its length is now a potentially dangerous single carriageway because of station parking along its length. It is understood that further development is already planned between Potten End and Hemel, and once completed this in itself will cause an increase in general and commuter traffic. Any further increase will cause huge traffic problems, will be to the serious detriment of the environment, local citizens and wildlife.

The lower town end of Ivy House Lane goes over a restricted railway bridge and thence either to George Street or Bank Mill both of which are effectively only narrow single carriageways because of parking, and the latter runs over an extremely limited access traditional canal bridge.

E] Wildlife. There are frequently deer on the agricultural land of which this Greenbelt site comprises. There are also 2 badger sets, of which at least one is very active, on the wooded banks in the fields of the AONB directly opposite. The badgers frequently forage in the field where the development is being considered and regularly use the field to access the gardens of local residents, including ourselves. Red Kite are now frequently seen above the field looking for carrion, and other smaller birds are numerous. It is difficult to see how the proposed development would help the existing diversity of wild life, and it is probable that the increased traffic, urbanization and potential cat population would decimate what is currently there.

F] Non-vehicular Access and Sustainability. We find the proposal to install a cycle track laudable but laughable. The site is in a steep sided valley, and further the proposed site access to or from the town is then down another steep hill, or back up it. Also a sufficient route into or away from the site would require large amounts of already congested land to be purchased and allocated. It would appear the cycle track offer by one of the potential developers is merely an unrealistic [and probably cynical] attempt to tick some more boxes. In order to gain access to or from the town or elsewhere it

is highly probable that the large majority of journeys will be made by car or delivery vehicle, and thus exasperate the problems described in sections [C] Road Access and [D] Traffic above.

Access to schools for children would be a particular issue made worse by the current shortage of footpaths and the topography. The nearest current primary schools are at Swing Gate Lane or Potten End. Both would result in extremely tortuous routes via already congested areas and bottlenecks, and would require the crossing, then walking along, of roads with fast moving traffic.

G] Public Transport. There is no public transport in Ivy House Lane, and there are no bus stop pull ins or other amenities within a realistic walking distance bearing in mind the lack of any footpaths and the topography of the area.

H] Farmland. In addition to being in the Green Belt and adjoin the AONB, the proposed site at Ivy House Lane has been under continuous agriculture for many years – probably many hundreds of years or even millennia. Government Policy is stated to support an increase in domestic agriculture and any proposal to build on such land appears entirely contradictory.

Neil Aitchison and Philip Jones document :

- The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House Lane. This field immediately adjoins Hunters Park house rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far **away** as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility on the **Meadway** junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a

single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 3.2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House Lane. There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel Path.

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

Dacorum Plan Proposals and Considerations

The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites as set out in the Ove Arup report and could have been released as an alternative

C.1 There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable.

1.Past Inspectors Decisions

In the statement at Appendix A, I have set out a reasoned assessment of what has been said previously

in relation to this site by a member of the Planning Inspectorate. To summarise previous assessments have considered the effect on the Green Belt to be significant. Further that other sites which are still in part undeveloped would be more suitable for development. The TRL assessment does not really drill down into the detail of each site as to the ways in which shortcomings can be overcome or linked together with other sites to produce better infrastructure, bus services and other amenities on a holistic basis.

2. Highways

TRL have not considered the serious constraints on highway access to this site. The developer cannot easily solve these as they do not control the key properties required for access but even if they were able to widen the Lane it would ruin the rural character with lighting but would still not solve the problems of the access bridges or junctions. Further this destroys the argument over the defensible boundary to the AONB. It is not only vehicles from the site that are a problem but also delivery vehicles from e-commerce.

3. Density

The proposal is for 150 dwellings including 40% affordable. Apart from this being an inaccessible site for affordable housing if it were included, it would be visually very prominent and would be visible not only to residents but from the wider Green Belt area. The proposed density is not sustainable of traffic grounds.

4. Landscaping

Even if a landscaping belt were planted on the eastern edge of the field due to the contours the development cannot be screened. Trees would require to be of an unsustainable height and even a modest screen would take 20 years to mature. The developers do not control the remaining trees and hedges on the edge of the site.

5. Public Transport

The limited 3 x daily bus service, we would challenge as being inadequate but it is not near the site and a diversion is unlikely based on the needs of Petton End and Castle Village.

6. Schools

The majority of schools in Berkhamsted are all north of the Canal except Bridgewater School which is over 1 mile distant. The nearest primary school is Swing Gate Lane which arguably cannot be safely reached over the existing highway network.

7. Access to Employment

There is little local employment left in Barkhamsted other than local services and two small industrial estates off Billett Lane, therefore the likely residents of a scheme here will be car borne commuters to the wider area surrounding defeating sustainability criteria.

8. Social Cohesion

An isolated new community with no joined up infrastructure or facilities is unlikely to encourage social cohesion.

9. Green Belt

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of less than 50 detached houses.

Conclusion

1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining

1 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study.

1 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including

4. The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town.

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] . I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues

and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances

I do not believe the site would be more suitable for release than any of the sites identified in the plan.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan- evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to

schools, access to the A41 bypass and ability to enhance or provide public transport.

Van Vlyman:

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between

Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt and the creation of "defensible boundaries" is given any weight then the Green Belt area to the south of Castle Village will be put at risk.

- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

1 Road Access

3.1 As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

3.4 As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

3.5 In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

3.6 The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

3.8 Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

1 Housing and Community Services Strategic Objective

4.1 The Core Strategy has policies for a mix of housing and for 35% of new houses to be "affordable". These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).

4.2 We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

1 Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).

We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Morris:

We are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.

Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the

surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

Impact on AONB and Sustainability

With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

Include files	
Number	Question 46
ID	LP1022308
Full Name	Mr & Mrs Wotherspoon

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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainabiliy</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.</p> <p>Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it</p>

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In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the

reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for

Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt and the creation of "defensible boundaries" is given any weight then the Green Belt area to the south of Castle Village will be put at risk.

- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its

western edge, blind corners, gradient and speeding vehicles.

- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These “pinch-points” in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
- Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.
- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

Housing and Community Services Strategic Objective

- The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).
- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on

traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

We write to object to the potential development in the Ivy House Lane field. Our views are those of Mr and Mrs Ostle and their letter of 13/12 17. We agree fully with their position and agree with all they say. (see below)

Mr & Mrs Ostle:

We have been resident [REDACTED]

Berkhamsted is an old market town at the bottom of a fairly steep valley. As such routes of communication already result in very significant bottlenecks and congestion in the town centre. There is also severe shortage of reasonable parking space for residents, shoppers and commuters.

The existing traffic congestion and the steep slopes on two sides of the town results in sub optimal air quality and noticeable traffic fumes at certain times of the day and climatic condition. This is detrimental to the people who work there as well as shoppers and children. There is already a shortage of doctors' surgeries, and schools are reportedly at capacity, and local hospital facilities have been significantly reduced.

There has already been a large increase in the number of residencies in Berkhamsted and a significant number more are already planned. Berkhamsted is well ahead of its 10 year building plan, whereas other areas of Dacorum are well below. It seems only right that these areas should catch up with their Programmes before extra requirements are forced on areas that have already done more than their proportionate share.

Comments relating to Be-h3 Ivy House Lane

We agree with learned views expressed by Neil Aitchison BSc FRICS, Sharon Van Vlymen, Philip Jones and Bruce Morris representing respectively the majority of all residents of Ivy House Lane, Meadway, Hunters Park and the bridletrack off Gravel Path commonly known as the Common.

Our very specific objections to development in this area are;

A] Greenbelt and AONB. The proposal would result in high density housing built on Greenbelt immediately adjoining an area of the Chiltern AONB. The conspicuous position of the proposed site at the head of a dry Chiltern Valley would result in considerable injury to the visual amenities of the Greenbelt and AONB which would appear to be in direct conflict with the Planning Policy Guidance, and Planning Inspectorates [DoE Bristol] findings since May 1991. Furthermore, the Council appear to have omitted to recognize the findings of their

own Residential Area Character Study which identified that the area around this proposed Greenbelt site and adjoining AONB was characterised by low density detached housing, in essence producing the 'soft' boundary between urban and rural areas that the Council have pursued. There is no doubt that the proposal would also unacceptably harm the character and appearance of the whole area.

B] Scenic and rural surroundings and boundary. The surrounding area of rural undulating hills would be significantly and detrimentally affected and it would not be practical to avoid a hard boundary between the AONB and the proposed development. This is directly contrary to previous Dacorum Planning Depts stated objectives of maintaining a soft boundary between the urban development and the surrounding sensitive area. The Planning Dept have re-iterated this objective several times since the late 1980's up to recently, and it has been upheld by the National Planning Inspectorate of the DOE. Further References and related matter can be supplied – please advise if required.

C] Road Access. Ivy House Lane is generally a single carriageway lane and over a lot of its length either borders or runs through AONB. The road frequently gets into very bad condition, and has severe restrictions over the railway and canal bridges. Much of the road has been recently impassable for several days to all but experienced drivers in proper 4x 4 vehicles because of the steep slopes, snow and ice and assumed lack of access for ploughing or gritting. Significant improvement to Ivy House Lane will significantly affect the rural nature of this outermost boundary of the town and the AONB. Access to the proposed site from other directions, even if achievable, will all result in a very considerable increase in traffic on Gravel Path.

D] Traffic. Berkhamsted is already very congested, and Gravel Path, the crossroads at the top of Gravel Path, and the Potten End Road are particularly busy already, especially when people, deer and other wide life also widely use parts of the area. The unmade bridle path, traditionally known as the Common and also believed to be within the AONB, is already frequently used as a potentially dangerous rat run with drivers wanting to avoid delays at the cross roads. It will be difficult to improve either Gravel Path or the Potten End Road without significantly detracting from their rural nature and their softening of the urban and AONB boundaries. Even if the Potten End Road and crossroads were improved much traffic would have to use New Road which for much of its length is now a potentially dangerous single carriageway because of station parking along its length. It is understood that further development is already planned between Potten End and Hemel, and once completed this in itself will cause an increase in general and commuter traffic. Any further increase will cause huge traffic problems, will be to the serious detriment of the environment, local citizens and wildlife.

The lower town end of Ivy House Lane goes over a restricted railway bridge and thence either to George Street or Bank Mill both of which are effectively only narrow single carriageways because of parking, and the

latter runs over an extremely limited access traditional canal bridge.

E] Wildlife. There are frequently deer on the agricultural land of which this Greenbelt site comprises. There are also 2 badger sets, of which at least one is very active, on the wooded banks in the fields of the AONB directly opposite. The badgers frequently forage in the field where the development is being considered and regularly use the field to access the gardens of local residents, including ourselves. Red Kite are now frequently seen above the field looking for carrion, and other smaller birds are numerous. It is difficult to see how the proposed development would help the existing diversity of wild life, and it is probable that the increased traffic, urbanization and potential cat population would decimate what is currently there.

F] Non-vehicular Access and Sustainability. We find the proposal to install a cycle track laudable but laughable. The site is in a steep sided valley, and further the proposed site access to or from the town is then down another steep hill, or back up it. Also a sufficient route into or away from the site would require large amounts of already congested land to be purchased and allocated. It would appear the cycle track offer by one of the potential developers is merely an unrealistic [and probably cynical] attempt to tick some more boxes. In order to gain access to or from the town or elsewhere it is highly probable that the large majority of journeys will be made by car or delivery vehicle, and thus exasperate the problems described in sections [C] Road Access and [D] Traffic above.

Access to schools for children would be a particular issue made worse by the current shortage of footpaths and the topography. The nearest current primary schools are at Swing Gate Lane or Potten End. Both would result in extremely tortuous routes via already congested areas and bottlenecks, and would require the crossing, then walking along, of roads with fast moving traffic.

G] Public Transport. There is no public transport in Ivy House Lane, and there are no bus stop pull ins or other amenities within a realistic walking distance bearing in mind the lack of any footpaths and the topography of the area.

H] Farmland. In addition to being in the Green Belt and adjoin the AONB, the proposed site at Ivy House Lane has been under continuous agriculture for many years – probably many hundreds of years or even millennia. Government Policy is stated to support an increase in domestic agriculture and any proposal to build on such land appears entirely contradictory.

Neil Aitchison and Philip Jones document :

- The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House Lane. This field immediately adjoins Hunters Park house rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding

residents but also distant views from as far **away** as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility on the **Meadway** junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 3.2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House Lane. There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel Path.

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going

to work or easy access to the railway station or the town for those that work locally.

Dacorum Plan Proposals and Considerations

The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites as set out in the Ove Arup report and could have been released as an alternative

C.1 There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable.

1. Past Inspectors Decisions

In the statement at Appendix A, I have set out a reasoned assessment of what has been said previously in relation to this site by a member of the Planning Inspectorate. To summarise previous assessments have considered the effect on the Green Belt to be significant. Further that other sites which are still in part undeveloped would be more suitable for development The TRL assessment does not really drill down into the detail of each site as to the ways in which shortcomings can be overcome or linked together with other sites to produce better infrastructure, bus services and other amenities on a holistic basis.

2. Highways

TRL have not considered the serious constraints on highway access to this site. The developer cannot easily solve these as they do not control the key properties required for access but even if they were able to widen the Lane it would ruin the rural character with lighting but would still not solve the problems of the access bridges or junctions. Further this destroys the argument over the defensible boundary to the AONB. It is not only vehicles from the site that are a problem but also delivery vehicles from e-commerce.

3. Density

The proposal is for 150 dwellings including 40% affordable. Apart from this being an inaccessible site for affordable housing if it were included, it would be visually very prominent and would be visible not only to residents but from the wider Green Belt area. The proposed density is not sustainable of traffic grounds.

4. Landscaping

Even if a landscaping belt were planted on the eastern edge of the field due to the contours the development

cannot be screened. Trees would require to be of an unsustainable height and even a modest screen would take 20 years to mature. The developers do not control the remaining trees and hedges on the edge of the site.

5. Public Transport

The limited 3 x daily bus service, we would challenge as being inadequate but it is not near the site and a diversion is unlikely based on the needs of Petton End and Castle Village.

6. Schools.

The majority of schools in Berkhamsted are all north of the Canal except Bridgewater School which is over 1 mile distant. The nearest primary school is Swing Gate Lane which arguably cannot be safely reached over the existing highway network.

7. Access to Employment

There is little local employment left in Barkhamsted other than local services and two small industrial estates off Billett Lane, therefore the likely residents of a scheme here will be car borne commuters to the wider area surrounding defeating sustainability criteria.

8. Social Cohesion

An isolated new community with no joined up infrastructure or facilities is unlikely to encourage social cohesion.

9. Green Belt

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of less than 50 detached houses.

Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining

- 1 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study.

1 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including

4. The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town.

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED]. I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan- evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The guidance is as set out below in succinct format as follows:-

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"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the

lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Van Vlyman:

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the

boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.

- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

1 Road Access

3.1 As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

3.2 Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.

3.3 Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.

3.4 As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.

3.5 In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

3.6 The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

3.7 Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.

3.8 Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

1 Housing and Community Services Strategic Objective

4.1 The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).

4.2 We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

1 Recommendations

Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable).

We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it.

The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Morris:

We are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.

Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones of Hunters Park (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison of Ivy House Lane (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen of Meadway (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

Impact on AONB and Sustainability

With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

	<p>In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.</p> <p>We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.</p>
Include files	
Number	Question 46
ID	LPIO22312
Full Name	Mr & Mrs Champion
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p>

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- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow and has parking on one side. These "pinch-points" in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.
- Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.
- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

Housing and Community Services Strategic Objective

- The Core Strategy has policies for a mix of housing and for 35% of new houses to be "affordable". These policies are not deliverable at the Ivy House

	<p>Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).</p> <ul style="list-style-type: none"> We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development. <p>Recommendations</p> <ul style="list-style-type: none"> Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22316
Full Name	Mr & Mrs Mitchell
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted</p>

valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

Impact on AONB and Sustainability

With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be

easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] [REDACTED] (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation

from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

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"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

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"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is dearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe

characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.

- As regards the argument that developing this site would represent a “rational rounding off of the boundary”, the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to “defend”. The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the “rounding-off” of Green Belt and the creation of “defensible boundaries” is given any weight then the Green Belt area to the south of Castle Village will be put at risk.
- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site’s location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from

frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.

- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

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Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Include files	
Number	Question 46
ID	LPIO22320
Full Name	Mr & Mrs Eustace
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 are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.</p> <p>Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won't repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.</p> <p><u>Northern Edge Specific Issues</u></p> <p>The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.</p> <p><u>Impact on AONB and Sustainabiliy</u></p> <p>With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.</p> <p>Access to the town centre will be particularly difficult given the narrow bridges across both the railway and canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with</p>

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significant intrusion into the AONB physically due to the land required and visually due to street lighting.

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- As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
- Ivy House Lane is notably steep on both sides of the valley and can be impassable to normal vehicles in very cold weather or snow. Substantial earthworks may be required to bring the gradient to the standard required for a development of the kind proposed.
- Even if Ivy House Lane itself was widened to permit two-way traffic, the crossing of the railway at Ivy House Lane and the crossing of the Grand Union Canal at Bank Mill are single lane bridges with difficult approaches. George Street does not provide an exit as it is effectively single lane due to residents' parking and its junction with Gravel Path.
- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

Section two is a series of blind bends between Hunters Park and the railway bridge. A number of safety issues have been highlighted along this section relating to the width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

- The Gravel Path bridge over the railway is single lane, as are the Ivy House Lane overline bridge and the two underline bridges feeding on to Station Road. Ravens Lane itself is two-way, but is narrow

and has parking on one side. These “pinch-points” in traffic flow along Gravel Path/Ravens Lane are very unlikely to be improved/removed, not least in view of their traffic-calming effect and the expense of replacing the historic Collins overline iron bridge.

- Frequently, and particularly at school run time, traffic backs up at the crossings of the railway. Gravel Path currently has approximately 5,000 vehicle movements (north- and south-bound) per day. Peak southbound-only flow between 07.00 and 09.00 is approximately 550 movements (HCC figures 2016). Two movements per house from the proposed 125 dwellings at the Ivy House Lane site over this 2hr period will mean 250 more movements (a 45% increase). At the standard 6 vehicle movements/dwelling/day there will be an additional 750 vehicle movements/day on Gravel Path – an increase of 15%. This will result in exponentially longer queuing times and increased vehicle exhaust pollution in the valley.
- Parking in Berkhamsted is already difficult. The Ivy House Lane site is so far from the centre of town that walking (or cycling) is impractical, and so additional parking will be required in the town.

Housing and Community Services Strategic Objective

- The Core Strategy has policies for a mix of housing and for 35% of new houses to be “affordable”. These policies are not deliverable at the Ivy House Lane site. Its registration at HM Land Registry (Title HD20150) records that it is subject to covenants in favour of each of the owners of properties in Meadway. These limit development to detached dwellings on plots of a minimum of 1/3rd acre and preclude any business use (eg. as a care home or other social facility).
- We note that these development covenants are supported by policies of the Chilterns AONB which are expressly incorporated into the Core Strategy. These suggest that national housing densities may not be appropriate in sites such as this and that larger gardens are indicated so that trees can achieve sufficient size to screen the development.

Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers’ money or development officers’ time should be spent on it. The residents of Meadway listed

	below have approved this letter and asked me to sign and deliver it on behalf of them.
Include files	
Number	Question 46
ID	LPIO22324
Full Name	Mr & Mrs Rasiah
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 inclusion of the said site in your Issues and Options Paper.</p> <p>In this regard I support the succinct statements made by Mr.Neil Aitchison representing residents of Ivy house Lane, Mr.Phillip Jones representing the Hunters Park residents and Mr.Bruce Morris representing primarily the residents of Brackenhill and would urge Council to consider their weighted evidence.</p> <p>In my view the consultants review underestimates the impact this development will have on the existing infrastructure which is already woefully inadequate. The lane fronting this site is mainly a single lane with very few passing places. The lane is also prone to flooding when it rains. As motor vehicles will be the only form of access to the town the proposed level of housing can only exacerbate the situation. Cycling and cycle lanes are not an option due to the steepness of the hills. Given the topography of the site nor is widening the lane an option. Notwithstanding this even if it is widened at enormous cost the exit ends are just as problematic – Bank Mill Lane has a narrow railway bridge and a canal bridge, George street is virtually a single lane by virtue of residents car parking, Gravel path with its blind spots and narrowness has also a narrow railway bridge to contend with.</p> <p>Both this site and the land to its west are used for growing crops and offers far reaching majestic views of the countryside not only to (and thanks to its green belt status) those residing here but is also a haven for wild life including deer, badgers, bats and birds. With the increase in traffic , artificial lighting, increased noise and pollution it can only be detrimental to wild life.</p> <p>I consider development of this site would also compromise its ‘openness’. It can be inferred from Para 79 of the NPPF that openness is an “essential characteristic” of the green belt which the policy is designed to protect. In:-</p> <ul style="list-style-type: none"> • <i>R (Lee Valley Regional Park Authority) v Epping Forest DC</i> [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ

- *“The concept of “openness” here means the state of being free from built development, the absence of buildings”*

Inappropriate development by definition can only be harmful to the green belt. Demand for housing alone cannot constitute ‘very special circumstances’ and used for circumventing the green belt provisions.

Summarising – on the grounds that this development would cause undue harm, detract the openness, exacerbate access and sustainability issues this site should be excluded from Council’s list.

Bruce Morris' response:

We are residents of Brackenhill, Lanrick Copse and houses situated along the north of site Be-h3, Land at Ivy House Lane. Some of us will make more detailed representations on the Issues and Options List for Dacorum. This letter simply records our objection to the inclusion of the Ivy House Lane option in the Issues and Options Paper. It is our strong belief that it should be removed from the list of sites to be taken forward to the next stage.

Given the severe impact that such a development would have on the north side of the cherished Berkhamsted valley, action groups have liaised to formulate responses. In order to keep this note as brief as possible we won’t repeat in detail the arguments and evidence which has been submitted to Berkhamsted Town Council by Mr Phil Jones [REDACTED] (as coordinator on behalf of residents of Hunters Park). We also concur with the planning related issues that have also been raised by Mr N Aitchison [REDACTED] (as coordinator on behalf of residents of Ivy House Lane). Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting.

Northern Edge Specific Issues

The land surrounding the Ivy House Lane option is a haven for badgers, very varied birdlife, deer and bats which we see frequently. We have concerns that their habitat will come under threat. The bridleway from which many of us access our houses would undoubtedly become a rush hour rat run placing extra strain on the environment. This would increase the risk of deer strikes as they get flushed out of the woods onto the surrounding roads. The local homeowners are responsible for upkeep of the bridleway and the extra unauthorised wear and tear would be to their account. We believe the bridleway is part of AONB and Common Land.

Impact on AONB and Sustainability

With respect to the Ivy House Lane site any suggestion that screening the eastern boundary will protect the AONB is in our opinion fundamentally flawed. The topography of the site (rises from east to west) will make any attempt to do so ineffective.

Access to the town centre will be particularly difficult given the narrow bridges across both the railway and

canal. Ivy House Lane is a single car width road for a significant proportion of its length and it wouldn't cope with the 750 extra car journeys a day. Gravel Path would likely pick up a large proportion of this traffic and it already struggles due to its narrowness, blind corners, and ever increasing delivery van traffic. This is before any increase resulting from planned expansion to Potten End or Hemel Hempstead. Using New Road provides an alternative but forces you under narrow bridges with poor visibility and congestion with station and school traffic and parked up Travis Perkins delivery lorries.

It is our opinion that the option fails to meet the sustainability criteria as walking or cycling to the town centre is not realistic given the steep hill and inability to widen the pathways at certain points.

The local service infrastructure also struggles and we have experienced evening failures in our water supply reportedly due to exceptional demand during the summer. Whether Affinity Water could cope with another 125 dwellings is highly questionable.

Conclusion

In summary it is our belief that whilst a simple glance at a map suggests the Ivy House Lane option should be easy it is anything but. It forms a critical boundary between the adjacent AONB and the town. Its development would place significant burdens on the north of the canal infrastructure. It fails to comply with policies included in the Core Strategy for Dacorum and the Berkhamsted Place Strategy. In our opinion it fails to meet the very special circumstances requirement for development on Greenbelt and should be immediately disallowed. The site has been rejected before for very good reasons and the current review by TRL should not alter the prior proper and detailed assessments.

We also feel that consideration should be given to adding this small field into AONB to prevent this becoming a ground-hog day experience for all involved given the number of times this site has come up for assessment and been rejected.

We also concur with the planning related issues that have also been raised by Mr N Aitchison of Ivy House Lane (as coordinator on behalf of residents of Ivy House Lane) (see below)

I am a resident of Ivy House Lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and

transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan."

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through

unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Lastly we draw your attention to the density issues raised with Dacorum Borough Council by Mrs Sharon Van Vlymen [REDACTED] (as coordinator on behalf of residents of Meadway). We agree with their submissions and trust that they will be considered with due weighting. (see below)

We are residents of Meadway which adjoins the Green Belt land to the west of Ivy House Lane as identified (Be-h3) in Dacorum's Schedule of Site Appraisals (for Large Greenfield Sites) October 2017 as the site for a development of around 125 houses. The development would not comply with relevant policies set out in the Core Strategy document and we consider that this site should be removed from the list of sites to be taken forward to the next stage.

1 Conserving the Green Belt and CAONB

The Core Strategy document sets out policies for the Chilterns AONB and adopts NPPF policies for protecting the Green Belt and conserving the natural environment.

We note that:

- Dacorum's document The Green Belt Review: Purposes Assessment for Dacorum includes the site in a parcel identified as contributing significantly towards safeguarding the countryside from encroachment. The site displays strong countryside characteristics (undulating open arable farmland). It displays no urban fringe characteristics. The Inspector in his Report (September 2002) on the Local Plan Inquiry considered that there was a strong visual and physical link between the site and the open countryside to the east.
- As regards the argument that developing this site would represent a "rational rounding off of the boundary", the Inspector in his Report disagreed. He concluded (para 4.21.3) that development would not be a rational rounding off of the boundary and (para. 4.21.4) that a more well-defined boundary would not justify amending the boundary in view of the harm that would be caused to the openness of the wider Green Belt.
- This is reinforced by the guidance in June 2016 from Mr Brandon Lewis, the Minister of State for Housing and Planning, who confirmed:

The [NPPF] makes it clear that inappropriate development may be allowed only where very special circumstances exist, and 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.

- The existing developments to the north and south of the site end at the crest of the hills and are well screened by trees. Hunters Park is less well screened but is set back in the valley before it opens out and is not visually intrusive into the AONB.
- Developing the site will remove all Green Belt in this valley – there will no longer be any boundary to "defend". The site is a Green Belt buffer between Berkhamsted and the Chilterns AONB but it is not the only such buffer around Berkhamsted - there are similar Green Belt parcels to the east and south of Castle Village. If the "rounding-off" of Green Belt and the creation of "defensible boundaries" is given

any weight then the Green Belt area to the south of Castle Village will be put at risk.

- Development on the Ivy House Lane site will introduce intrusive light pollution into an area adjacent to the AONB. Bringing Ivy House Lane itself up to the standard required is discussed below but we note that this will represent a significant intrusion into the AONB physically due to the land required and visually due to street lighting.

Road Access

- As noted above, given the site's location, cars will inevitably be the predominant mode of transport to and from the Ivy House Lane site. The only adopted road frontage is Ivy House Lane. It is a lightly-used, narrow sunken lane with hedging on its eastern boundary to the AONB. Bringing it up to standard as the major access to the development will require intrusion into the AONB and the removal of the hedging which screens traffic on the lane from the AONB. Alternatively, land could be compulsorily acquired from frontagers but that would mean removing the trees and hedges that screen their houses from the AONB.
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- As an alternative to Ivy House Lane the development may seek to connect with Meadway. Here we note that Meadway is not an adopted road and has very narrow entrances at either end. As Meadway frontagers, we have no intention of bringing it up to the standard required for it to be adopted. We note also that almost every year there are collisions of varying degrees of seriousness at the junction of Meadway and Gravel Path. It is recognised that the junction is substandard. It dates from a time of fewer and slower cars, and would not be approved today. In addition, the junction of Meadway with Ivy House Lane itself involves a blind turn which needs the support of a mirror and has also been a site of accidents.
- In the event access to Gravel Path were secured, note that the Tring, Northchurch and Berkhamsted UTP Scheme Proforma describes Gravel Path below Hunter's Park as follows:

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width of carriageway, lack of pedestrian facilities on its western edge, blind corners, gradient and speeding vehicles.

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Recommendations

- Our assessment, therefore, of site Be-h3 is that it cannot make a significant contribution toward delivering the objectives of the Core Strategy. It can make a very limited contribution to future land supply and will not deliver the mix of housing and the affordable housing sought in the Core Strategy. The negative effects of any development of the Ivy House Lane site on the Chilterns AONB, including views in and out, on Green Belt protection around

Berkhamsted, on sustainability objectives and on traffic outweigh by a substantial margin the benefits of the limited number of additional houses (none of which will be affordable). We recommend that the Ivy House Lane site should not be taken forward as a Site Option and no more Council Tax payers' money or development officers' time should be spent on it. The residents of Meadway listed below have approved this letter and asked me to sign and deliver it on behalf of them.

Philip Jones' response:

This written statement is submitted by Philip Jones [REDACTED] [REDACTED] Berkhamsted. I represent the views [REDACTED] [REDACTED] and my comments set out below reflect the views of residents

- The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House. This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.
- Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.
- Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

- There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.
- It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel Path.
- There are few bus services on this side of the town. There is a bus operator known as “Little Jims”, which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

Dacorum plan Proposals and Considerations

- Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion between their assessment and previous assessments on this site. The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites given the issues of isolation from the town and the need for car related journeys through narrow roads.
- There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

1. Biodiversity

This is acknowledged to be a potential problem and loss of habitat.

2. Water

- 1 There is no commentary about the existence of main services and our suspicion is that main services would have to be brought into this site as it is known that the existing housing in Ivy House Lane only provided for the current level of
- 2 There is no public sewer in Ivy House Lane and existing houses are served by soakaway. There is a six inch foul sewer which runs from Hunters Park through the valley but because it cannot cope with current volumes it frequently causes blockages in connecting pipes in Hunters Park and would be inadequate in its size to cope with the additional proposed development of up to 150

3. Flood Risk

The central area of the field already floods during wet periods and we suspect that the acreage, if it were developed, would have to be substantially reduced to allow for a balancing lake at a low point in the land to collect the surface water run-off. This would reduce the net developable area substantially, possibly taking up a large area of land which would have to be fenced off for safety reasons.

4. Climate Change

This refers to buses within 300 metres (should be 0.3 miles?) of the site, however, the service is too infrequent to serve the number of proposed dwellings or to deal with traffic movements. It is likely that all the residents would be car users and those that aren't would be isolated by the fact of there being no public footpaths within the vicinity affecting walking to the nearest bus stop and certainly no safe access for schools for children.

5. Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7. Resource Efficiency

No comment at this stage

8. Historic Environment

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

9.Landscape

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of 45 houses and

not 150 houses. Proposals by Dacorum Borough Council for affordable housing would therefore be a very dense level at 40% of the site effectively getting on for half the site area and because of this very built urban form of terraced and flatted development would result in a large chunk of visual intrusion being added to what is a semi-rural area at present, notwithstanding the traffic and other problems likely to be associated with it. These factors relating to density and design constraints have been totally ignored in the analysis.

10.Health and Wellbeing

The site does not offer immediate access to schools, railway station or town centre and would undoubtedly result in car traffic using a single width lane without footpaths, with dangerous railway and canal bridges and generally filtering through the existing unsustainable road network. This site together with the allotments at the foot of Ivy House Lane, were rejected in the last District Plan enquiry of Dacorum Borough Council by an Inspector.

11.Sustainability

It is acknowledged that the site has poor accessibility to local facilities especially primary schools. The nearest primary school is at Swing Gate Lane which would involve walking along Ivy House Lane, then George Street and across the Canal into Greene Walk and then onto the school. The only other method of getting to the school would be via car transport either crossing over the narrow canal bridge at Bank Mill or at the end of heavily congested George Street and then the busy tight canal bridge on Gravel Path.

Secondary schools in Berkhamsted, other than part of Berkhamsted School, are all located on the southern side of the town which is better served with road access both to the A41 bypass and to the High Street and facilities. Bus service access is superior on the southern side of the town. Other sites identified are offering improvements to these facilities on the south side of the town.

12. Community Cohesion

It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

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It is questionable in design terms that the proposed density could be achieved without major detrimental visual impact and has randomly ignored the design constraints of this

edge of town location. Further consideration of this location is inappropriate for the reasons already stated.

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Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".

Conclusion

	<ol style="list-style-type: none"> 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments. 2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins it 3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage. 4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town.
Include files	
Number	Question 46
ID	LPIO22330
Full Name	Philip Jones
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Yes. Our points specifically relate to Be-h3 Ivy House Lane site which we strongly believe should be excluded from <i>the draft</i> Local Plan for <i>the stated</i> reasons shown in <i>detail on</i> pages 3 through 8 of the Planning Statement below:</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both</p>

sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel Path.

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

- Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion between their assessment and previous assessments on this site. The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features

of the site as weighed against other potential sites given the issues of isolation from the town and the need for car related journeys through narrow

- There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

1. Biodiversity

This is acknowledged to be a potential problem and loss of habitat.

2. Water

- 1 There is no commentary about the existence of main services and our suspicion is that main services would have to be brought into this site as it is known that the existing housing in Ivy House Lane only provided for the current level of
- 2 There is no public sewer in Ivy House Lane and existing houses are served by soakaway. There is a six inch foul sewer which runs from Hunters Park through the valley but because it cannot cope with current volumes it frequently causes blockages in connecting pipes in Hunters Park and would be inadequate in its size to cope with the additional proposed development of up to 150

3. Flood Risk

The central area of the field already floods during wet periods and we suspect that the acreage, if it were developed, would have to be substantially reduced to allow for a balancing lake at a low point in the land to collect the surface water run-off. This would reduce the net developable area substantially, possibly taking up a large area of land which would have to be fenced off for safety reasons.

4. Climate Change

This refers to buses within 300 metres (should be 0.3 miles?) of the site, however, the service is too infrequent to serve the number of proposed dwellings or to deal with traffic movements. It is likely that all the residents would be car users and those that aren't would be isolated by the fact of there being no public footpaths

within the vicinity affecting walking to the nearest bus stop and certainly no safe access for schools for children.

5. Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7. Resource Efficiency

No comment at this stage

8. Historic Environment

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

9. Landscape

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of 45 houses and not 150 houses. Proposals by Dacorum Borough Council for affordable housing would therefore be a very dense level at 40% of the site effectively getting on for half the site area and because of this very built urban form of terraced and flatted development would result in a large chunk of visual intrusion being added to what is a semi-rural area at present, notwithstanding the traffic and other problems likely to be associated with it. These factors relating to density and design constraints have been totally ignored in the analysis.

10. Health and Wellbeing

The site does not offer immediate access to schools, railway station or town centre and would undoubtedly result in car traffic using a single width lane without footpaths, with dangerous railway and canal bridges and generally filtering through the existing unsustainable road network. This site together with the allotments at the foot of Ivy House Lane, were rejected in the last District Plan enquiry of Dacorum Borough Council by an Inspector.

11. Sustainability

It is acknowledged that the site has poor accessibility to local facilities especially primary schools. The nearest primary school is at Swing Gate Lane which would involve walking along Ivy House Lane, then George Street and across the Canal into Greene Walk and then onto the school. The only other method of getting to the school would be via car transport either crossing over the narrow canal bridge at Bank Mill or at the end of heavily congested George Street and then the busy tight canal bridge on Gravel Path.

Secondary schools in Berkhamsted, other than part of Berkhamsted School, are all located on the southern side of the town which is better served with road access both to the A41 bypass and to the High Street and facilities. Bus service access is superior on the southern side of the town. Other sites identified are offering improvements to these facilities on the south side of the town.

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
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Include files	
Number	Question 46
ID	LPIO22333
Full Name	Dr A Nath
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
	This written statement is submitted by Philip Jones of  Berkhamsted. I represent  and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.

The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House. This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

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7.Resource Efficiency

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Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
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- 4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town

Include files	
Number	Question 46
ID	LPIO22336
Full Name	Mr & Mrs R Turner
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div>	<p data-bbox="823 163 1469 353">This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.</p> <p data-bbox="823 365 1469 1032">The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run- off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.</p> <p data-bbox="823 1043 1469 1487">Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.</p> <p data-bbox="823 1498 1469 1718">Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.</p> <p data-bbox="823 1729 1469 1926">There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.</p> <p data-bbox="823 1937 1469 2063">It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel</p>

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12. Community Cohesion

It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

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Include files

Number

Question 46

ID

LP1022339

Full Name	Mr & Mrs G Fensome
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

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6. Soil

No comment at this stage

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No comment at this stage

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Include files	
Number	Question 46
ID	LPIO22342
Full Name	Mrs C Longbottom
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 wish to object to all the Berkhamsted sites and specifically Be -h3 Ivy House Lane site.</p> <ul style="list-style-type: none"> • My main points relating to the Ivy House Lane site on which I feel strongly are; <ol style="list-style-type: none"> 1 This very steep sloping site is on the fringes of the town and is in a highly unsustainable Any development will destroy both animal habitat and the protective edge of the Chiltern Area of Outstanding Natural Beauty to which it is adjoined. Spectacular views along the valley will be denied to future generations 1 Removal of fertile land from food production which directly affects both employment and erodes the economic scale of local farming 1 Speed and safety issues along narrow, twisting and steep Gravel Path, which is the likely main route into town for this site, would be aggravated by any increased traffic from this proposed development 2 There is an existing lack of capacity in Berkhamsted's public services doctors, dentists, schools, railway, buses, parking, broadband, water and sewerage so it is difficult to appreciate how any development could improve the local economy <p>Site access, particularly for construction traffic and residents, is a critical issue as all road approaches to and from the town are constrained by width and weight restricted bridges and tunnels which are height restricted. Unless this access is de-bottlenecked no development should be allowed</p> <p>This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character</p>

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Include files	
Number	Question 46
ID	LPIO22345
Full Name	Mr & Mrs N Tiley
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

Traffic in the area is already at full capacity. The roads and bridges are narrow and cannot be widened. Public transport is already stretched. The steepness of the valley prevents it being used by all but the most experienced cyclists. There are frequent water and sewerage problems which would only be exacerbated by more houses. **Q46 site Be-h3 Ivy House Lane, Berkhamsted**

New houses should be built where there already is infrastructure in place ie secondary school places and GP and medical facilities - that is Hemel Hempstead. Berkhamsted's schools and surgeries are already full. **Q46 Berkhamsted and Hemel Hempstead**

The site in question (Be-h3) was highlighted by the Planning Inspector in a previous enquiry as of importance as a vista as one approaches the town of Berkhamsted.

This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED]

my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.

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5. Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7. Resource Efficiency

No comment at this stage

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It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on

facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

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13.Housing

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Include files	
Number	Question 46
ID	LPIO22348
Full Name	Mr & Mrs J Godfrey
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>My objection relates to the inclusion of the site Be-h3 Land at Ivy House Lane when as recently as July 2013 Dacorum and the Independent Inspector deemed it to be retained in Green Belt. Since then nothing has changed other than yet another speculative developer approach encouraged by the ill-conceived methodology of Call for Sites driving this Consultation process.</p> <p>I support the points made in Mr Jones (see below).</p> <p>This site is about as unsustainable as imaginable as outlined in the points below</p> <ol style="list-style-type: none"> 1 site topography and access 2 surrounding road quality – one way with width, height and weight restrictions over railway and canal 3 water resource issues 4 natural resources being spoiled 5 train and station overcapacity 6 infrastructure of school places; especially Secondary school places 7 medical facilities - GP capacity; dentists; hospital access; care provision 8 disturbance of existing townscapes <ol style="list-style-type: none"> 1 limited local job opportunities <p>We believe that for all the above reasons, this and other Berkhamsted proposed Green Belt sites should not be pursued.</p> <p>This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] and [REDACTED]</p>

my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.

The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top

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5.Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6.Soil

No comment at this stage

7.Resource Efficiency

No comment at this stage

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Include files	
Number	Question 46
ID	LPIO22352
Full Name	Mr & Mrs R Riseley
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div>	<p>This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run- off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.</p> <p>Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.</p> <p>Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.</p> <p>There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.</p> <p>It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the</p>

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Include files

Number

Question 46

ID	LPIO22354
Full Name	Mr & Mrs D Shetty
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Equally, the Stage 2 Green Belt review by Arup concluded that the site sensitivity rating for the Ivy House Lane field is Medium which resulted in inclusion of this site in the TRL study, and was similarly superficial and This is illustrated by the photo, principally focussed on a flooded Ivy House Lane, which ironically is repeatedly described as "a dry valley", showing a view of less than half of the site. It is well known "a picture paints a thousand words" yet the photo barely shows the relative height or its adjacency to the adjoining Area of Outstanding Natural Beauty (AONB). It significantly underplays "the steeply sloping valley sides" (the photo gives the appearance the site is almost flat) and totally neglects the scenic four mile view along the valley which could suggest the photo was deliberately chosen to justify the Medium sensitivity rating. Also the basis for the positive suggestion that "the lane to the east affords enhancement and mitigation / screening potential in relation to development of the site" is gratuitous as it is difficult to understand how any house building provides enhancement in an area of AONB and there is no practical indication of the width or height of screening required to maintain the blackout that currently exists. Furthermore there is no balanced assessment as no significant comments are mentioned under transport routes which are highly relevant to the site sensitivity. Continuing to include sites such as Ivy House Lane destroys credibility in the planning processes and confirms that undue weighting is given to developer influence and is not focused on building the right houses in the right place.</p> <p>By not following basic processes and supporting timely infrastructure investment, for which no developer so far has noticeably contributed to in Berkhamsted, the town is now capacity constrained. Lessons should be learned from poor historical decisions and future infrastructure and house building investment, particularly in capacity constrained market towns, should be coordinated on a timely basis.</p> <p>1 We do not agree with the inclusion of the Be-h3 Land at Ivy House Lane in the Local Plan. There has been no change in circumstances since it was rejected in July 2013 by Dacorum Borough Council and the</p> <p>1 We agree with the points made in Mr Jones statement (see below).</p>

- 1 Poor highways from Ivy House Lane to access the town via one-way width and weight restricted bridges and height restricted tunnels make this site unsustainable for development.

- 1 Cosmetic highway changes, such as one way systems, new traffic lights and signs at intersections created by new development, cannot be called improvements as risk is increased where stoppages are hidden by road bends. In addition suggested new cycle and footpaths around Ivy House Lane are potentially lethal and impractical non-starters due to the narrow, twisting, limited visibility country roads with houses built at the top and the services at the bottom of very steep hills.

- 1 In Berkhamsted it is understandable that no new connecting roads have been built across the valley or into the town centre in the past 20 years due to prohibitive cost and preserving the town's historic medieval market character. However, with road building effectively frozen for 20 years and combined with the finite existing available road space along the valley floor knowingly reduced by about 50% due to commuter and on-street resident parking (poor planning decisions not providing adequate off-street parking for both old and new developments!) means the roads around the town centre are now unsustainable and capacity constrained. With a proposed new car park not planned until 2020 and located in the most congested part town, it clearly demonstrates the time lag and inadequacy of coordination between house building and highway planning.

Similarly poor house building coordination and planning is impacting water supply, sewerage, broadband and medical services:

a. GP's are not attracted to Berkhamsted due to rapidly growing ageing patient lists and insufficient time to provide a safe patient service. Existing local medical facilities are deteriorating as GP's retire / leave and are not replaced. In some practices patients have to wait several weeks for an appointment. Access to more specialised medical facilities involves uncertain travel times at peak periods of over 45 minutes to distant Watford, Luton, Stoke Mandeville etc. hospitals and discriminates against the market towns. Ignoring these issues and continuing to build non-affordable homes in Berkhamsted will only aggravate demographic pressures on medical facilities.

b. There are water supply issues in the Ivy House Lane area with 3 outages without notification during this past summer. In addition Gravel Path is a patchwork of repaired road surfaces and has been excavated at least 5 times in 2017 as a result of repairs to burst water pipes.

In summary and for the reasons stated above, the Ivy House Lane site should be withdrawn from further consideration for removal from Green Belt.

This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.

The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the

western entrance does not offer a safe and suitable access to Gravel

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

Dacorum Plan Proposals and Considerations

- Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion between their assessment and previous assessments on this site. The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites given the issues of isolation from the town and the need for car related journeys through narrow
- There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

1. Biodiversity

This is acknowledged to be a potential problem and loss of habitat.

2. Water

- 1 There is no commentary about the existence of main services and our suspicion is that main services would have to be brought into this site as

it is known that the existing housing in Ivy House Lane only provided for the current level of

- 2 There is no public sewer in Ivy House Lane and existing houses are served by soakaway. There is a six inch foul sewer which runs from Hunters Park through the valley but because it cannot cope with current volumes it frequently causes blockages in connecting pipes in Hunters Park and would be inadequate in its size to cope with the additional proposed development of up to 150

3.Flood Risk

The central area of the field already floods during wet periods and we suspect that the acreage, if it were developed, would have to be substantially reduced to allow for a balancing lake at a low point in the land to collect the surface water run-off. This would reduce the net developable area substantially, possibly taking up a large area of land which would have to be fenced off for safety reasons.

4.Climate Change

This refers to buses within 300 metres (should be 0.3 miles?) of the site, however, the service is too infrequent to serve the number of proposed dwellings or to deal with traffic movements. It is likely that all the residents would be car users and those that aren't would be isolated by the fact of there being no public footpaths within the vicinity affecting walking to the nearest bus stop and certainly no safe access for schools for children.

5.Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6.Soil

No comment at this stage

7.Resource Efficiency

No comment at this stage

8.Historic Environment

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

9.Landscape

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of 45 houses and not 150 houses. Proposals by Dacorum Borough Council for affordable

housing would therefore be a very dense level at 40% of the site effectively getting on for half the site area and because of this very built urban form of terraced and flatted development would result in a large chunk of visual intrusion being added to what is a semi-rural area at present, notwithstanding the traffic and other problems likely to be associated with it. These factors relating to density and design constraints have been totally ignored in the analysis.

10. Health and Wellbeing

The site does not offer immediate access to schools, railway station or town centre and would undoubtedly result in car traffic using a single width lane without footpaths, with dangerous railway and canal bridges and generally filtering through the existing unsustainable road network. This site together with the allotments at the foot of Ivy House Lane, were rejected in the last District Plan enquiry of Dacorum Borough Council by an Inspector.

11. Sustainability

It is acknowledged that the site has poor accessibility to local facilities especially primary schools. The nearest primary school is at Swing Gate Lane which would involve walking along Ivy House Lane, then George Street and across the Canal into Greene Walk and then onto the school. The only other method of getting to the school would be via car transport either crossing over the narrow canal bridge at Bank Mill or at the end of heavily congested George Street and then the busy tight canal bridge on Gravel Path.

Secondary schools in Berkhamsted, other than part of Berkhamsted School, are all located on the southern side of the town which is better served with road access both to the A41 bypass and to the High Street and facilities. Bus service access is superior on the southern side of the town. Other sites identified are offering improvements to these facilities on the south side of the town.

12. Community Cohesion

It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

13.Housing

It is questionable in design terms that the proposed density could be achieved without major detrimental visual impact and has randomly ignored the design constraints of this edge of town location. Further consideration of this location is inappropriate for the reasons already stated.

14.Economy

This scheme will not achieve any more than would be offered elsewhere in the Dacorum Area.

15.Employment

This development will do nothing for developing the skills of Berkhamsted. Access to broadband is an issue in this area and there would be no improvement to local education or services and just more delivery traffic. This section could be applied to any site and is not site specific and therefore irrelevant and inappropriate in such a detailed consideration.

Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".

Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
- 2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins
- 3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage.
- 4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town

Include files

Number

Question 46

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It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel

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5. Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7. Resource Efficiency

No comment at this stage

8. Historic Environment

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

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Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed

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Include files	
Number	Question 46
ID	LPIO22360
Full Name	Mr & Mrs J Rush
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

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Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".

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- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
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	<p>3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage.</p> <p>4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town</p>
Include files	
Number	Question 46
ID	LPIO22363
Full Name	Mr & Mrs D Haannah
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
	<p>This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run- off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.</p> <p>Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and</p>

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There is no public transport in Ivy House Lane and there are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

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There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

Dacorum Plan Proposals and Considerations

- Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion between their assessment and previous assessments on this site. The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites given the issues of isolation from the town and the need for car related journeys through narrow
- There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material

change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

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This is acknowledged to be a potential problem and loss of habitat.

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Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7.Resource Efficiency

No comment at this stage

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Include files	
Number	Question 46
ID	LPIO22366
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This plan has not looked at the constraints of Berkhamsted in relation to the valley topography, existing infrastructure, the demographics and what kind of need there is for housing. The sites put forward do not offer efficient or appropriate building of houses for Berkhamsted, nor does it take into consideration the character of the town or the current access to green areas. Berkhamsted does not have the infrastructure nor the capacity to improve the infrastructure to accommodate the proposed, excessive growth.</p> <p>The current 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 have put these very same sites forward for development. Many of the sites now proposed are specially identified in the Berkhamsted Vision Diagram as being "Sensitive Valley Sides". The reasons previously given for rejection still hold good.</p> <p>The Urban Design Assessment (UDA) highlights that the valley form allows for a number of scenic views across the valley sides and stresses the need to safeguard these views across the valley. Should Be-h3</p>

Land at Ivy House Lane be developed these views will be lost forever.

Be-h3 Land at Ivy House Lane

The field at Ivy House Lane has been agricultural land for more than 30 years. Development of the site will result in loss of valuable regularly cultivated arable land.

The land is not only visible to the residents adjacent to the site but due to its high level of openness, provides distant views from as far away as the valley at Westbrook Hay and other notable vantage points. It is open in character and there is no substantial hedge or vegetation along the boundary with Ivy House Lane.

The AONB is currently separated from the development at Hunters Park by this open agricultural area. Due to the nature of topography adding any kind of screening cannot be effective. It is not the width of any added landscaping but the height that is the key issue and it is unrealistic to state that any development will not have an adverse landscape effect on the setting of the Chilterns AONB. This site has been rejected in several past inquiries and as recent as 2012. In the past the inspector stated: "As there is no screening along the eastern boundary of the objection site there is a strong visual and physical link between the site and the open countryside to the east. I consider, therefore, that the development of the site would have a detrimental impact on the attractive landscape to the east. In my view, it would visually encroach into the adjoining countryside contrary to the main purpose of the Green Belt."

This field can only be accessed from Ivy House Lane, a narrow single lane with limited passing places. At the North end it joins the Common, a dangerous road where the speed limit has been reduced to 40mph due to the number of accidents in recent years. Despite the reduced speed limit the junction undoubtedly remains hazardous. From there travel into Berkhamsted town centre would either be via Gravel Path or New Road. Gravel Path is a narrow, winding road with a weak single lane bridge and is already struggling to cope with the current traffic load. The amount of traffic and speed has long been a concern of local residents and Safer Gravel Path Action Group has been campaigning for years for a safer Gravel Path. New Road enters the town via two single lanes beneath the tracks both with severe height restrictions and they get extremely busy daily.

At the South end there is a junction with Meadway, a private road, with limited visibility at the junction and the road then widens briefly until the lane narrows after Sunnyside church by the railway bridge where it again becomes single lane. At both Bank Mill and George Street the roads are extremely narrow due to the lack of off road parking making both roads virtually single lane. At Bank Mill the road has a sharp turn with low visibility before crossing the canal over a narrow bridge.

There is no public transport on Ivy House Lane. The nearest bus is at least 600m away and the bus serving this area departs 3 times a day from Castle Village though not on Sunday's where there is no service. The service is not suitable for anyone working in town or commuting from Berkhamsted Train Station. A large

proportion of Berkhamsted residents already live within ten minutes of a bus stop and generally the services to the town centre are good but usage remains low. Creating an additional bus stop or a more frequent bus service will not change this.

Access to the bus stop would initially involve walking along a narrow single lane with no footpaths. Building additional footpath is not feasible and suggestions that residents will walk to and from the town on any pathway provided is highly unlikely due to the gradient and distance between the site and the town centre. There are no dedicated cycling lanes anywhere near the site and it would not make any sense to add any as it would not encourage people to cycle due to the very long and steep gradient to location of the site. Hertfordshire County Council prepared a Bikeability Audit Report on Berkhamsted in 2013 where it stated the following: "Cycling on Gravel Path is hazardous, especially on the ascent and becomes a Level 3+ (Roads not recommended for cycling) due to its steep ascent and subsequent slow speed of cyclists on the narrow carriageway". Berkhamsted is characterized by steep gradients, which constitute a major barrier to cycling in the town. In certain locations (Gravel Path, Chesham Road, Bridle Way and Swing Gate Lane) gradients are such that the implementation of specific cycle measures would prove futile". Ivy House Lane displays similar gradient as Gravel Path and the reports findings will apply to Ivy House Lane too.

The land is some distance from Berkhamsted railway station. How it was measured to be 1km from the railway line is questionable as the shortest route was 1.76km when we walked it from Ivy House Lane.

It is clear that any sustainable travel aspirations are not viable and as the site has poor accessibility to local facilities (including schools, GPs, town centre and shops) it will cause a significant increase in car usage leading to even more congestion and pollution. It is disheartening that a market town like Berkhamsted already has issues with poor air quality in certain areas. Building more housing in areas where sustainable travel is impossible will add to the existing problems and exacerbate existing issues with air pollution.

The field is a natural habitat for local wildlife such as deer, muntjacs, badgers, foxes, hares, bats, ducks, pheasants, owl, woodpeckers, thrushes, blackbirds, robins, swallows and heron etc. The loss of habitat to this wildlife and the effect of pollution on night flying fauna should not be ignored.

Water supply in the area has been subject to frequent repairs along Gravel Path. In the past 4 months the road has been closed 3 times 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 apparently due to low pressure, and adding 125-150 new houses will further stress the water supply.

The development will have an impact on the valley sides and it is an important dry valley location. The central area already floods during wet periods.

Due to the valley shape nature of Berkhamsted there is little open space within the town centre itself and the Green Belt is part of the inherent character. Green Belt and AONB provide recreational space for local residents and Ivy House Lane is currently an access point to these areas. Due to limited access and the road being a single lane track, there is very modest traffic and the people of Berkhamsted walk there in order to gain access to AONB and other green areas. People would be unable to continue to enjoy this if the development went ahead because of the sheer amount of traffic generated by it. Adding a playground or incorporating any green open space does not replace green belt and the majority of residents in Berkhamsted will not be able to make use of it. Developing the proposed site will impact the health and wellbeing of local residents and have a strong negative effect on the existing inhabitants and the environment. We strongly disagree with the statement made by TRL that: "Providing additional housing and contributions toward wider infrastructure improvements for the town, development at this site could help to maintain community vibrancy and vitality." This statement and many others confirm that the review of the green belt undertaken by TRL is fundamentally biased. The town is both vital and vibrant as shown by the large number of restaurants, public houses, sports and social clubs. I see no exceptional circumstances justifying that the greenbelt boundaries should be altered.

As residents on Hunters Park, I can confirm that we have been approached by a developer wanting an option to buy our house in order to gain access to the site from Hunters Park. We have informed the developer that we are not interested. Our house is not for sale.

This written statement is submitted by Philip Jones of [REDACTED], Berkhamsted. I represent [REDACTED] my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.

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	<p>Conclusion</p> <ol style="list-style-type: none"> 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments. 2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins 3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage. 4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town
Include files	
Number	Question 46
ID	LPIO22369
Full Name	Mrs A Allison
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel

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Dacorum Plan Proposals and Considerations

- Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion

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- There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

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Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7. Resource Efficiency

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Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site

	<p>Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".</p> <p>Conclusion</p> <ol style="list-style-type: none"> 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments. 2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins 3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage. 4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town
Include files	
Number	Question 46
ID	LPIO22372
Full Name	Mr & Mrs V Watson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
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Include files	
Number	Question 46
ID	LPIO22375
Full Name	Mr & Mrs J Jensen
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Our comments relate to Be-h3 Land at Ivy House lane in theLocal Plan and do not understand why this site is actively considered every five years especially when there have been no change in circumstances . I have

lived in Hunters Park for more than 30 years and in each instance the decision has been made to retain this land in Green Belt. It is clear that any reasonable person immediately recognises that the site is part of AONB. The last review was in July 2013 when it was excluded by Dacorum Borough Council and the Inspector from the Core Strategy. The perpetual review cycle creates unnecessary anxiety, wastes time of all concerned and this site should be withdrawn from further consideration.

- 1 Ivy House lane has very limited access to the town with its restricted and congested roads. Highway investment to improve or create any new road space has been non-existent in Berkhamsted for the past 20 years despite acknowledgment that it is by far the most significant means of local transport (over 70%). Road space has steadily been eroded over this same period by on-street resident and commuter parking while further building is being proposed to make the situation even worse. The promoter suggestion to build cycle-ways and footpaths on the tight, steep and twisty roads is positively dangerous and irrelevant. The site is at the top of a very steep hill and the reasons are obvious why cycling (1%) and walking to town is insignificant in Berkhamsted relative to driving by car. As this site is one of the highest locations in the Chilterns, it is an unsustainable location relative to the flatter areas around Hemel.

c. I strongly support the the points made in Mr Jones statement Also I fully endorse the statement on the Berkhamsted Town Council website referencing a letter from "t he Department of Communities and Local Government, dated June 2016, the Minister of State for Housing and Planning, Brandon Lewis, states that ". . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people."

d. Considerations of major infrastructure issues associated with this site relate to distant access to specialised medical facilities and lack of school capacity. Recent water supply outages and frequent pipeline repairs on burst pipes on Gravel Path an' d White Hill suggest capacity is old and limited. There is no sewerage capacity unless it is proposed to step back in time and use cess pit s. Also broadband connect ion issues are common in the area with regular weekly visits from BT Engineers at the nearest exchange cabinet .

To conclude I believe the Ivy House Lane site should not be removed from Green Belt or included in the proposed Local Plan in 2018.

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- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
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Include files	
Number	Question 46
ID	LPIO22378
Full Name	Mr & Mrs B Groves
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
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There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

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The central area of the field already floods during wet periods and we suspect that the acreage, if it were developed, would have to be substantially reduced to allow for a balancing lake at a low point in the land to collect the surface water run-off. This would reduce the net developable area substantially, possibly taking up a large area of land which would have to be fenced off for safety reasons.

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This refers to buses within 300 metres (should be 0.3 miles?) of the site, however, the service is too infrequent to serve the number of proposed dwellings or to deal with traffic movements. It is likely that all the residents would be car users and those that aren't would be isolated by the fact of there being no public footpaths within the vicinity affecting walking to the nearest bus stop and certainly no safe access for schools for children.

5.Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6.Soil

No comment at this stage

7.Resource Efficiency

No comment at this stage

8.Historic Environment

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

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Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of 45 houses and not 150 houses. Proposals by Dacorum Borough Council for affordable housing would therefore be a very dense level at 40% of the site effectively getting on for half the site area and

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Include files

Number

Question 46

ID

LP1022381

Full Name	Mr & Mrs Shaw
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>This written statement is submitted by Philip Jones of ██████████ Berkhamsted. I represent the views ██████████ and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.</p> <p>Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.</p> <p>Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.</p> <p>There is no public transport in Ivy House There are no footpaths in Ivy House Lane and there is limited street</p>

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Include files	
Number	Question 46
ID	LPIO22384
Full Name	Mr & Mrs P Jenkins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
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10. Health and Wellbeing

The site does not offer immediate access to schools, railway station or town centre and would undoubtedly result in car traffic using a single width lane without footpaths, with dangerous railway and canal bridges and generally filtering through the existing unsustainable road network. This site together with the allotments at the foot of Ivy House Lane, were rejected in the last District Plan enquiry of Dacorum Borough Council by an Inspector.

11. Sustainability

It is acknowledged that the site has poor accessibility to local facilities especially primary schools. The nearest primary school is at Swing Gate Lane which would involve walking along Ivy House Lane, then George Street and across the Canal into Greene Walk and then onto the school. The only other method of getting to the school would be via car transport either crossing over the narrow canal bridge at Bank Mill or at the end of heavily congested George Street and then the busy tight canal bridge on Gravel Path.

Secondary schools in Berkhamsted, other than part of Berkhamsted School, are all located on the southern side of the town which is better served with road access both to the A41 bypass and to the High Street and facilities. Bus service access is superior on the southern side of the town. Other sites identified are offering improvements to these facilities on the south side of the town.

12. Community Cohesion

It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on

facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

13.Housing

It is questionable in design terms that the proposed density could be achieved without major detrimental visual impact and has randomly ignored the design constraints of this edge of town location. Further consideration of this location is inappropriate for the reasons already stated.

14.Economy

This scheme will not achieve any more than would be offered elsewhere in the Dacorum Area.

15.Employment

This development will do nothing for developing the skills of Berkhamsted. Access to broadband is an issue in this area and there would be no improvement to local education or services and just more delivery traffic. This section could be applied to any site and is not site specific and therefore irrelevant and inappropriate in such a detailed consideration.

Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".

Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
- 2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins
- 3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is

	<p>also a question over the availability of adjoining services including sewerage.</p> <p>4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town</p>
Include files	
Number	Question 46
ID	LPIO22387
Full Name	Mr & Mrs C Pawson
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
	<p>This written statement is submitted by Philip Jones of ██████████ Berkhamsted. I represent ██████████ ██████████ Hunters Park and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.</p> <p>Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge</p>

there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House Lane and there are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

Dacorum Plan Proposals and Considerations

- Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion between their assessment and previous assessments on this site. The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites given the issues of isolation from the town and the need for car related journeys through narrow
- There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the

site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

1. Biodiversity

This is acknowledged to be a potential problem and loss of habitat.

2. Water

- 1 There is no commentary about the existence of main services and our suspicion is that main services would have to be brought into this site as it is known that the existing housing in Ivy House Lane only provided for the current level of
- 2 There is no public sewer in Ivy House Lane and existing houses are served by soakaway. There is a six inch foul sewer which runs from Hunters Park through the valley but because it cannot cope with current volumes it frequently causes blockages in connecting pipes in Hunters Park and would be inadequate in its size to cope with the additional proposed development of up to 150

3. Flood Risk

The central area of the field already floods during wet periods and we suspect that the acreage, if it were developed, would have to be substantially reduced to allow for a balancing lake at a low point in the land to collect the surface water run-off. This would reduce the net developable area substantially, possibly taking up a large area of land which would have to be fenced off for safety reasons.

4. Climate Change

This refers to buses within 300 metres (should be 0.3 miles?) of the site, however, the service is too infrequent to serve the number of proposed dwellings or to deal with traffic movements. It is likely that all the residents would be car users and those that aren't would be isolated by the fact of there being no public footpaths within the vicinity affecting walking to the nearest bus stop and certainly no safe access for schools for children.

5. Air Quality

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

6. Soil

No comment at this stage

7. Resource Efficiency

No comment at this stage

8.Historic Environment

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

9.Landscape

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of 45 houses and not 150 houses. Proposals by Dacorum Borough Council for affordable housing would therefore be a very dense level at 40% of the site effectively getting on for half the site area and because of this very built urban form of terraced and flatted development would result in a large chunk of visual intrusion being added to what is a semi-rural area at present, notwithstanding the traffic and other problems likely to be associated with it. These factors relating to density and design constraints have been totally ignored in the analysis.

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It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

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This scheme will not achieve any more than would be offered elsewhere in the Dacorum Area.

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Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".

Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.

	<p>2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins</p> <p>3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage.</p> <p>4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town</p>
Include files	
Number	Question 46
ID	LPIO22390
Full Name	Mr Neil Aitchison
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 site</p> <p>The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House Lane. This field immediately adjoins Hunters Park house rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.</p> <p>Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no</p>

left hand visibility on the **Meadway** junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass

in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles.

Thereafter using access to Bank Mill Lane, there is a canal bridge with, again with single width carriageway with a width of only 3.2m (10ft 5"). Access is also available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

There is no public transport in Ivy House Lane. There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel Path.

There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

Dacorum Plan proposals and Considerations

The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites as set out in the Ove Arup report and could have been released as an alternative

There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities

owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable.

1.Past Inspectors Decisions

In the statement at Appendix A, I have set out a reasoned assessment of what has been said previously in relation to this site by a member of the Planning Inspectorate. To summarise previous assessments have considered the effect on the Green Belt to be significant. Further that other sites which are still in part undeveloped would be more suitable for development The TRL assessment does not really drill down into the detail of each site as to the ways in which shortcomings can be overcome or linked together with other sites to produce better infrastructure, bus services and other amenities on a holistic basis.

1 Highways

TRL have not considered the serious constraints on highway access to this site. The developer cannot easily solve these as they do not control the key properties required for access but even if they were able to widen the Lane it would ruin the rural character with lighting but would still not solve the problems of the access bridges or junctions. Further this destroys the argument over the defensible boundary to the AONB. It is not only vehicles from the site that are a problem but also delivery vehicles from e-commerce.

3.Density

The proposal is for 150 dwellings including 40% affordable. Apart from this being an inaccessible site for affordable housing if it were included, it would be visually very prominent and would be visible not only to residents but from the wider Green Belt area. The proposed density is not sustainable of traffic grounds.

4.Landscaping

Even if a landscaping belt were planted on the eastern edge of the field due to the contours the development cannot be screened. Trees would require to be of an unsustainable height and even a modest screen would take 20 years to mature. The developers do not control the remaining trees and hedges on the edge of the site.

5.Public Transport

The limited 3 x daily bus service, we would challenge as being inadequate but it is not near the site and a diversion is unlikely based on the needs of Petton End and Castle Village.

6.Schools.

The majority of schools in Berkhamsted are all north of the Canal except Bridgewater School which is over 1 mile distant. The nearest primary school is Swing Gate Lane which arguably cannot be safely reached over the existing highway network.

7. Access to Employment

There is little local employment left in Barkhamsted other than local services and two small industrial estates off Billett Lane, therefore the likely residents of a scheme here will be car borne commuters to the wider area surrounding defeating sustainability criteria.

8. Social Cohesion

An isolated new community with no joined up infrastructure or facilities is unlikely to encourage social cohesion.

1 Green Belt

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of less than 50 detached houses.

Conclusion

Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining

The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study.

A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage.

The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of urban development which would jar with the existing soft edge to the town.

OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED **A**
ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL
AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)

I am a resident of Ivy House lane, [REDACTED]

[REDACTED] I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

“Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the

site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances I do not believe the site would be more suitable for release than any of the sites identified in the plan.

The next question to address is whether there should be a different interpretation of Green Belt Policy. DBC state that their assessment has to be governed by the National Planning Policy Framework. This supplanted previous circulars but the essence is carried through unchanged. I would particularly draw your attention to Paragraphs 87 and 88. The guidance theme is reiterated in reports set out on the Dacorum website under the reference Dacorum Plan - evidence basis of single local plan. This traces the Green Belt Assessment criteria back over the themes carried forward to the NPPF. The Guidance is as set out below in succinct format as follows:-

Para87

"As with previous Green Belt policy inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very exceptional circumstances".

Para BB

"When considering any planning application, local planning authorities should ensure sufficient weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

Section 4 of the NPPF also talks of sustainable transport issues which cannot be fulfilled on this site.

I disagree with the Council's superficial and inappropriate consideration of the highway problems in relation to this site. A single width road with limited passing places is not a suitable access. To change the character of the lane also impinges on the Green Belt by way of massing

of buildings, introduction of lighting and intrusion into an established low density housing area which would be in contravention of the established Residential Character Area Study already in existence under the established plan. The proposals on this site would lead to massive overdevelopment and therefore outweigh the superficial landscape considerations when considered on a holistic basis.

The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

On the wider consultation of general development the Inspectors comments from the previous consideration identified Bank Mill Lane, New Road and Shootersway/Durrants Lane as areas to be considered and clearly those areas would be more appropriate affording better highway infrastructure, access to schools, access to the A41 bypass and ability to enhance or provide public transport.

Include files	
Number	Question 46
ID	LPIO22395
Full Name	Mr & Mrs Goddard
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>I am a resident of Ivy House lane, [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough</p>

Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.

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The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-

"Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view the site topographically forms part of the dry valley which slopes away to the north east. As there is no screening along the eastern boundary of the objection site and there is a strong visual and physical link between the site and the open countryside to the east. I consider therefore that development of this site would have a detrimental impact on the attractive landscape to the east. In my view it would visually encroach into the adjoining countryside contrary to the main purposes of the Green Belt."

"In terms of the sites sustainability it only scores 8 points in the assessment of the main Council greenfield and objection sites (CD53A). This is much lower than any of the sites proposed in the Plan. In my opinion the site would be far less sustainable than the sites at Bank Mill Lane and New Road owing to the valley side location. In view of the distance to the nearest bus stop it would be less accessible than the site at Durrants Lane/ Shootersway. Moreover, it would not bring forward the same benefits. I find therefore that the lower score is entirely appropriate. Consequently I am not satisfied that the site would contribute to the sustainability objectives as required by Policy 5 of the SPR. In the circumstances

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Para BB

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The Issues and Options Consultation and the Draft Schedule of Site Appraisals as it relates to potential residential sites has not considered the issues in sufficient detail to be given any weight in this case. Past consideration as re-emphasised in the NPPF should be taken into account so far as suitability and sustainability are concerned. The weight of objection on this site on Green Belt, highway and sustainability criteria should result in it being erased from further consideration.

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Include files	
Number	Question 46
ID	LPIO22399
Full Name	Mr & Mrs Sewell
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>I am a resident of Ivy House lane [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.</p> <p>I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and</p>

those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.

The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.

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Include files	
Number	Question 46
ID	LPIO22403
Full Name	Mr & Mrs J Forrester
Company / Organisation	
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>I am a resident of Ivy House lane, [REDACTED]</p> <p>[REDACTED]</p> <p>I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.</p> <p>I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p> <p>This theme was reinforced by an Inspector in 2002 in considering this site as opposed to others and I quote:-</p> <p><i>“Although the land is surrounded on 3 sides by housing I do not consider that development of this site would amount to a rounding off of the boundary. In my view</i></p>

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Include files	
Number	Question 46
ID	LPIO22407
Full Name	Man & Mrs Forster
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>I am a resident of Ivy House lane, [REDACTED]</p> <p>[REDACTED]</p> <p>I am also a retired Chartered Surveyor and during my working life have advised both</p>

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Include files	
Number	Question 46
ID	LPIO22411
Full Name	Mr & Mrs J Riddle
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>I am a resident of Ivy House lane, [REDACTED]</p> <p>[REDACTED]</p> <p>I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.</p> <p>I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning</p>

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Include files	
Number	Question 46
ID	LP1022415

Full Name	Mr & Mrs M Avern
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>OBJECTION TO SITE Be-h3 LAND AT IVY HOUSE LANE BERKHAMSTED A</p> <p>ISSUES AND OPTIONS PAPER ISSUED BY DACORUM BOROUGH COUNCIL</p> <p>AND THE SUBJECT OF CONSULTATION (Three pages regarding objection from residents of Ivy House Lane.)</p> <p>I am a resident of Ivy House lane, [REDACTED]</p> <p>[REDACTED]</p> <p>I am also a retired Chartered Surveyor and during my working life have advised both developers and local authorities on strategic development. This statement of objection is submitted with the agreement of the residents of the upper part of the Lane as set out in the Appendix below. We shall continue to make similar representations to the Issues and Options Consultation to Dacorum Borough Council. The concern of all residents is that the draft site options document has not drilled down into sufficient detail on the relative merits of each site or even locations. Since Berkhamsted has become a primarily residential location with limited local service employment then highway and transport considerations of sustainability are more important and the site options have not been considered on a holistic basis.</p> <p>I have read through the Issues and Options paper and questionnaire and will be replying more fully to this document including an objection to Site Be-h3 in Ivy House Lane. This objection is based on sound planning reasons. These are also set out in a Written Statement of Objection which has been prepared by Mr Phillip Jones [REDACTED] which I understand will be forwarded to you for consideration. I have met Mr Jones and circulated his objection and this note so the residents that have been consulted including the list attached and those I write on behalf of are in agreement with the issues raised. My objection is to the consideration of the above site which has been considered inappropriate before.</p> <p>The Green Belt, highway and sustainable issues have only been considered at a superficial level which is not consistent with past or present planning policy. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport.</p>

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Include files	
Number	Question 46
ID	LPIO22439
Full Name	Mr Richard Collins
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	We do of course understand the need for more housing and the benefits for employment and investment that derive from building projects. However, we do not believe that Berkhamsted can take the level of development proposed in <i>any</i> of the options put forward within the current consultation and believe that the benefits would be significantly better distributed in local areas where

urban regeneration is desperately needed; where there is some capacity for development without devastating impact on the existing population and/or Green Belt; and where homes being built will be sufficiently affordable to genuinely meet the needs of those who require the expansion.

We do not propose to respond to each and every question raised within the consultation document, not least because the exercise is based on the incorrect supposition that we accept that further development must happen in Berkhamsted.

The majority of the proposed sites for planned development in and around Berkhamsted are on land currently designated as Green Belt. You set out in your consultation document the purpose of this designation which is essentially to protect the town it surrounds. With Berkhamsted already 34% in excess of the home building target set within the Core Strategy over the last ten years, it is wholly unsustainable for further development to take place, never mind on land designated as (and fulfilling *all* of the purposes of) Green Belt.

The Town's infrastructure is already under significant pressure and irrespective of initiatives or investment, little can realistically be done to relieve that. The geographic nature of the Town's establishment, nestled towards the bottom of a valley, combined with its Victorian/Edwardian pattern of narrow streets with on-street parking on steep hills, already makes traffic movement very difficult in Berkhamsted. Many people living here do cycle and walk already, but the geography of the Town means that no proposal based upon use of these methods could reasonably be relied upon, particularly from the top of any of the hills where the proposed developments are (in the main) to be sited. Little can be relied upon to relieve these problems as even where the hills are not steep and roads are slightly wider, there is the barrier created by the Grand Union Canal and the West Coast mainline railway and parking associated with those commuters. The town of Berkhamsted simply does not lend itself to being extended very much further and certainly not at the current rate or on the scale outlined in your consultation options.

We have very real concerns about the impact on traffic of proposed development, particularly to the south of the town. The railway station is on the north side with only one direct route across the town from south to north which would inevitably exacerbate what is already a traffic 'pinch point'. The same concerns apply to train travel where any regular commuter will attest to the frequency with which they already fail to get a seat between London and Berkhamsted and vice versa. Furthermore, additional Berkhamsted traffic using the A41 could only present an even greater accident risk than is already the case with exit/entry slip roads, etc. simply not designed for the current weight of traffic, never mind significantly more.

We also believe that the impact of development on other Berkhamsted infrastructure such as schools, doctors'

	surgeries and dentists would be enormous. We note comments made within the consultation documentation about contributions towards infrastructure provision, but history suggests otherwise and topography (as noted above) says that in any event, adding public services would simply result in even greater pressure on road systems that are already stretched and which are not capable of being adapted in any meaningful way.
Include files	
Number	Question 46
ID	LPIO22450
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Land east of Tring is identified as a unique opportunity to deliver a sustainable and well- designed expansion of the town. The c.100ha site, which is solely in the control of Harrow, is capable of accommodating c.1,400 new dwellings together with associated infrastructure including extensive areas of public open space, a new spine (link) road, community hub and associated facilities. The land could meet the majority of Tring’s housing needs within the plan period and integrate the residential areas of the existing settlement with Tring Station.</p> <p>Harrow purchased c.52ha of land located north of Station Road and to the south of Marshcroft Lane in 2013. The company subsequently promoted the land for allocation and development through the Core Strategy and Site Allocations and Development Management DPD, commissioning various technical to identify opportunities and constraints to inform both the suitability of the site for development and an emerging framework masterplan.</p> <p>Earlier this year, Harrow entered into a contract to promote land north of Marshcroft Lane, creating an overall site in the company’s single control of c.100ha comprising the following:</p> <ul style="list-style-type: none"> • Appraisal site TR-H1: Land north of Station Road, Tring • Appraisal site TR - H2: Land north of Marshcroft Lane, Tring; and • Additional land lying between Marshcroft Lane and Bulbourne Road, Tring <p>This presents a unique opportunity to bring forward a comprehensive and well-designed expansion of the town.</p>

Having identified a clear need for the borough to accommodate a high level of housing growth, and particular need for significant new housing in Tring, the Vision Document sets out the case for identification of land to the east of Tring to create a sustainable urban extension of the town. The land could deliver up to 1400 new dwellings in a well- designed development including the necessary infrastructure and other facilities to meet the development needs of the town.

- Land lying immediately east of Tring is not within the Chilterns AONB
- Harrow Estates plc controls c.100ha of land immediately abutting the eastern edge of the town and clearly defined by the boundaries of Bulbourne Road, Station Road and the Grand Union Canal; Tring Station lies in close proximity to the east of the land. The land represents a unique opportunity to deliver a sustainable and well-designed expansion of the town to provide up to 1,400 homes and supporting infrastructure, including community and open space uses and a new link road to ease traffic congestion in the town.
- The land has been subject to a series of technical appraisals and analysis that have informed an emerging framework masterplan for the site. That masterplan illustrates how the development could be brought forward as a series of linked 'villages' commencing with access from Station Road and eventually linking up to Bulbourne Road in the north. The development would be physically and functionally integrated with the existing settlement with a movement framework designed to facilitate non-car travel from and through the site to the town and Tring Station
- Development of the site has the potential to offer a wide range of benefits, including:
 - Making a significant contribution towards meeting the borough's housing needs
 - Specifically, its ability to meet the majority of the predicted housing needs for Tring in a sustainable extension of the town, designed and built according to 'place making' principles
 - Increasing the quantum of affordable housing and homes for young families in Tring; narrowing the affordability gap and re-balancing the population profile
 - Providing well-designed and cohesive development that meets place-making principles
 - Creation of a new spine / link road as an alternative route through the town alleviating traffic on existing routes
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 - New community facilities including allotments, new primary school, community hub with health centre,

small scale retail and live-work units or small office premises

- Economic benefits in terms of, inter alia, direct and indirect job creation, increased spending and council tax revenues
- The Sustainability Appraisal demonstrates that the development of 1,400 homes on land east of Tring represents a sustainable form of development reflecting the objectives and requirements of both national and local planning policy. The Appraisal which includes analysis against the council's sustainability objectives concludes that such development:
 - Is likely to have a significant positive effect in terms of meeting the objectives for water resources, flood risk, greenhouse gases and climate change, sustainable locations for development, meeting housing needs and achieving economic growth
 - Is likely to have a positive, non-significant, effect in terms of the objectives of bio- diversity and geo-diversity, air quality, natural resources, health and well-being, community cohesion and creating employment opportunities
 - Is unlikely to have any impact in terms of the objectives for making efficient use of land and protecting soils, environmental and cultural assets and conservation of landscape / townscape.
 - No negative or mixed effects are identified
 - The Appraisal clearly supports an allocation of the site as the most sustainable option for accommodating the development needs of the town
-

On that basis, there is a clear case for land east of Tring to be allocated as a strategic urban extension to the town. The c.100ha site is in the sole control of Harrow Estates and represents a unique opportunity to provide up to 1400 dwellings with associated infrastructure and community facilities in a comprehensive, well-designed development applying best practice of sustainability and place-making principles.

Harrow Estates Plc has instructed Turley and a range of technical consultants to undertake a detailed appraisal of sites Tr-H1, Tr-H2 and adjacent land lying immediately to the north comprising c.100 ha in total. Various documents have been produced to support their detailed representations to the issues and options consultation; collectively those reports demonstrate that:

- There is a need for the borough to accommodate at least 1,100 dpa in accordance with the Government's standardised methodology. Tring should accommodate a significant proportion of new housing commensurate with its status as a sustainable market town containing a full range of services.

	<ul style="list-style-type: none"> • More housing is required in Tring – to address the issues of a widening affordability gap and an aging population. • Sites Tr-H1, Tr-H2 and other land to the north are in the sole control of Harrow Estates Plc. Collectively they provide a unique opportunity to deliver a sustainable expansion of the town which could deliver c.1400 new dwellings, open space, a link road, community hub and associated facilities, SANGs and car parking. • Land east of Tring is in a highly sustainable location with access to the railway station, bus, cycle and pedestrian routes. The scale of opportunity enables sustainable objectives to be designed into the development which will follow key place-making principles, integrating into the existing settlement. <p>Further details are set out in the accompanying submission documents:</p> <ul style="list-style-type: none"> • Issues and Options Consultation Response • Vision Document • Local Needs Assessment • Sustainability Appraisal
Include files	Olivia Carr - Sustainability Appraisal - Vision document - Local Needs - Combined.pdf
Number	Question 46
ID	LPIO22469
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Land east of Tring is identified as a unique opportunity to deliver a sustainable and well- designed expansion of the town. The c.100ha site, which is solely in the control of Harrow, is capable of accommodating c.1,400 new dwellings together with associated infrastructure including extensive areas of public open space, a new spine (link) road, community hub and associated facilities. The land could meet the majority of Tring's housing needs within the plan period and integrate the residential areas of the existing settlement with Tring Station.</p> <p>Harrow purchased c.52ha of land located north of Station Road and to the south of Marshcroft Lane in 2013. The company subsequently promoted the land for allocation and development through the Core Strategy and Site Allocations and Development Management DPD, commissioning various technical to identify opportunities and constraints to inform both the suitability of the site for development and an emerging framework masterplan.</p>

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- Appraisal site TR-H1: Land north of Station Road, Tring
- Appraisal site TR - H2: Land north of Marshcroft Lane, Tring; and
- Additional land lying between Marshcroft Lane and Bulbourne Road, Tring
- This presents a unique opportunity to bring forward a comprehensive and well-designed expansion of the town.

Need for and Impact of New Housing in Tring

Tring is located in an area characterised by significant housing needs, and where historic levels of delivery have fallen substantially below assessed needs. This has manifested itself in acute affordability issues. There is therefore an imperative to significantly boost the supply of housing above historic levels.

In order to achieve the required increase in housing provision, all settlements within Dacorum will need to contribute towards ensuring that housing needs are met. The borough's main towns of Hemel Hempstead, Berkhamsted and Tring will particularly be required to make a proportionate contribution given their status in the settlement hierarchy and continued identification as sustainable growth locations.

Whilst supply has persistently failed to meet housing needs at borough level, the analysis in the report demonstrates that this has been even more pronounced in Tring contributing to a worsening imbalance between housing supply and demand in the town, with the cost of housing markedly increasing at a faster rate than seen elsewhere across the other larger settlements in Dacorum. Limited housing provision in Tring has also constrained growth of the town's population, contrasting with other settlements and leading to a demographic profile which is increasingly skewed towards older age groups. Notably, younger working age residents are under-represented in Tring, and have likely been forced to move elsewhere due to the increasingly high cost of accessing housing in the town and the historically limited provision of affordable housing.

A perpetuation of this trend, by failing to enable the sustainable growth of Tring in response to the overall scale of housing need, would worsen this imbalance in the demographic profile and further exacerbate affordability. This would serve to also undermine the strength of the local economy which relies on a local supply of economically active labour. In turn, this would threaten the resilience of local businesses, limit their ability to recruit and risk unsustainable changes to commuting patterns.

Provision for new housing is needed in Tring to address these challenges and protect the town's vitality and role within the settlement hierarchy, as well as to contribute towards ensuring that existing and future generations are able to access the housing that they need

On the basis of the higher growth options for the borough (2A/3) between **2,100 and 3,167 new homes** will be required in Tring over the plan period. The lower end of this range is considered to represent an absolute **minimum** level of housing growth needed in Tring over the plan period; this would:

- **Boost the supply of housing in Tring**, building more homes to address worsening affordability in line with the frequently stated aims of the Government. Provision for a minimum of 2,100 new homes in Tring over the plan period would on average facilitate an annual level of housing delivery more than three times that seen over the past five years. In contrast, the lowest option would reduce annual housing completions below even this limited level of recent historic provision;
- **Maximise provision of affordable housing**, with higher growth options inherently supporting the delivery of more affordable housing to address a significant need in the town and across the wider borough. This has not been met through recent levels of provision, and would not be met in future if such a low level of growth were sustained in Tring;
- **Maintain and strengthen Tring's role in the settlement hierarchy**, and secure its socio-economic prosperity that would be threatened by a continuation of the historic development profile. Provision of this scale would be expected to grow the labour force by at least 2,750 employed residents, supporting existing and prospective employers and increasing retail and leisure expenditure in the local and wider economy. In contrast, a diminishing labour force would likely result from more limited housing provision over the plan period;
- **Address and offset unsustainable changes in the demographic profile**, by accommodating an estimated 5,000 additional residents. Aligning with the existing stock profile would see provision of new family housing in Tring, which will play an essential role in retaining and attracting new working age residents to offset an ageing trend;
- **Increase investment and support employment through construction**, with the potential to annually support an estimated 49 full time equivalent employment opportunities both directly and indirectly through supply chain linkages and onward expenditure. This is substantially higher than the investment generated by a lower level of provision, and its associated employment impacts; and
- **Elevate financial benefits for the County, Borough and Town Councils**, through Council Tax and New Homes Bonus payments. This will provide an important and lasting source of additional revenue to invest in delivery of respective public services and infrastructure

Having identified a clear need for the borough to accommodate a high level of housing growth, and

particular need for significant new housing in Tring, the Vision Document sets out the case for identification of land to the east of Tring to create a sustainable urban extension of the town. The land could deliver up to 1400 new dwellings in a well- designed development including the necessary infrastructure and other facilities to meet the development needs of the town.

The Document confirms that Tring is a small and vibrant market town containing a full range of facilities to serve its resident population and a rural hinterland.

Tring has strong transport connections by rail, road, canal and for walking and cycling, providing access by non-car modes to main urban centres for employment, recreation and shopping.

With reference to the Local Needs Assessment report, it sets out that housing development in Tring has been severely constrained for many years by a tight urban grain and Green Belt boundary. In order to accommodate the development that the town needs, and that is required to make a proportionate contribution to the overall housing requirement of the borough, it will be necessary to release some land from the Green Belt.

Given that much of the countryside around the town is within the Chilterns AONB there are also landscape and environmental constraints to the growth of Tring.

Land East of Tring

- Land lying immediately east of Tring is not within the Chilterns AONB
- Harrow Estates plc controls c.100ha of land immediately abutting the eastern edge of the town and clearly defined by the boundaries of Bulbourne Road, Station Road and the Grand Union Canal; Tring Station lies in close proximity to the east of the land. The land represents a unique opportunity to deliver a sustainable and well-designed expansion of the town to provide up to 1,400 homes and supporting infrastructure, including community and open space uses and a new link road to ease traffic congestion in the town.
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Benefits

- Development of the site has the potential to offer a wide range of benefits, including:
- Making a significant contribution towards meeting the borough's housing needs
- Specifically, its ability to meet the majority of the predicted housing needs for Tring in a sustainable

extension of the town, designed and built according to 'place making' principles

- Increasing the quantum of affordable housing and homes for young families in Tring; narrowing the affordability gap and re-balancing the population profile
- Providing well-designed and cohesive development that meets place-making principles
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- New community facilities including allotments, new primary school, community hub with health centre, small scale retail and live-work units or small office premises
- Economic benefits in terms of, inter alia, direct and indirect job creation, increased spending and council tax revenues

Dacorum BC is at the early stages of preparing a new comprehensive local plan. That plan will need to ensure that it meets the full development needs for borough for the period to 2036.

- The council's own evidence base demonstrates a need to plan for a significant increase in housing, necessitating a review of the Green Belt. It confirms that in order to achieve sustainable development the majority of new housing should be primarily directed to the main settlements of Hemel Hempstead, Berkhamsted and Tring which each contain a full range of services.
- Reports and studies prepared on behalf of Harrow Estates clearly demonstrate that the housing requirement for Dacorum should be at the upper range of the council's assessed options (c.1,100 dpa). There is a particular need to identify sufficient land for housing development in Tring to address a widening affordability gap and aging population profile; a minimum of 2,100 dwellings is required for the town.

On that basis, there is a clear case for land east of Tring to be allocated as a strategic urban extension to the town. The c.100ha site is in the sole control of Harrow Estates and represents a unique opportunity to provide up to 1400 dwellings with associated infrastructure and community facilities in a comprehensive, well-designed development applying best practice of sustainability and place-making principles.

Harrow Estates Plc has instructed Turley and a range of technical consultants to undertake a detailed appraisal of sites Tr-H1, Tr-H2 and adjacent land lying immediately to the north comprising c.100 ha in total. Various documents have been produced to support their detailed representations to the issues and options consultation; collectively those reports demonstrate that:

	<ul style="list-style-type: none"> • There is a need for the borough to accommodate at least 1,100 dpa in accordance with the Government's standardised methodology. Tring should accommodate a significant proportion of new housing commensurate with its status as a sustainable market town containing a full range of services. • More housing is required in Tring – to address the issues of a widening affordability gap and an aging population. • Sites Tr-H1, Tr-H2 and other land to the north are in the sole control of Harrow Estates Plc. Collectively they provide a unique opportunity to deliver a sustainable expansion of the town which could deliver c.1400 new dwellings, open space, a link road, community hub and associated facilities, SANGs and car parking. • Land east of Tring is in a highly sustainable location with access to the railway station, bus, cycle and pedestrian routes. The scale of opportunity enables sustainable objectives to be designed into the development which will follow key place-making principles, integrating into the existing settlement. <p>Further details are set out in the accompanying submission documents:</p> <ul style="list-style-type: none"> • Issues and Options Consultation Response • Vision Document • Local Needs Assessment • Sustainability Appraisal
Include files	Olivia Carr Harrow Estates - Tring_Local Needs Assessment_Socio-Economic Report_PDF.pdf
Number	Question 46
ID	LPIO22470
Full Name	Ashleigh Michnowiec
Company / Organisation	Harrow Estates plc
Position	
Agent Name	Mrs Sam Ryan
Company / Organisation	Turley Estates
Position	Director
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Land east of Tring is identified as a unique opportunity to deliver a sustainable and well- designed expansion of the town. The c.100ha site, which is solely in the control of Harrow, is capable of accommodating c.1,400 new dwellings together with associated infrastructure including extensive areas of public open space, a new spine (link) road, community hub and associated facilities. The land could meet the majority of Tring's housing needs within the plan period and integrate the residential areas of the existing settlement with Tring Station.

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- Appraisal site TR - H2: Land north of Marshcroft Lane, Tring; and
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This presents a unique opportunity to bring forward a comprehensive and well-designed expansion of the town.

Vision Document

Having identified a clear need for the borough to accommodate a high level of housing growth, and particular need for significant new housing in Tring, the Vision Document sets out the case for identification of land to the east of Tring to create a sustainable urban extension of the town. The land could deliver up to 1400 new dwellings in a well- designed development including the necessary infrastructure and other facilities to meet the development needs of the town.

The Document confirms that Tring is a small and vibrant market town containing a full range of facilities to serve its resident population and a rural hinterland.

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Given that much of the countryside around the town is within the Chilterns AONB there are also landscape and environmental constraints to the growth of Tring.

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to deliver a sustainable and well-designed expansion of the town to provide up to 1,400 homes and supporting infrastructure, including community and open space uses and a new link road to ease traffic congestion in the town.

- The land has been subject to a series of technical appraisals and analysis that have informed an emerging framework masterplan for the site. That masterplan illustrates how the development could be brought forward as a series of linked 'villages' commencing with access from Station Road and eventually linking up to Bulbourne Road in the north. The development would be physically and functionally integrated with the existing settlement with a movement framework designed to facilitate non-car travel from and through the site to the town and Tring
- Development of the site has the potential to offer a wide range of benefits, including:
 - Making a significant contribution towards meeting the borough's housing needs
 - Specifically, its ability to meet the majority of the predicted housing needs for Tring in a sustainable extension of the town, designed and built according to 'place making' principles
 - Increasing the quantum of affordable housing and homes for young families in Tring; narrowing the affordability gap and re-balancing the population profile
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- Dacorum BC is at the early stages of preparing a new comprehensive local plan. That plan will need to ensure that it meets the full development needs for borough for the period to 2036.
- The council's own evidence base demonstrates a need to plan for a significant increase in housing, necessitating a review of the Green Belt. It confirms that in order to achieve sustainable development the majority of new housing should be primarily directed to the main settlements of Hemel Hempstead, Berkhamsted and Tring which each contain a full range of services.

	<ul style="list-style-type: none"> • Reports and studies prepared on behalf of Harrow Estates clearly demonstrate that the housing requirement for Dacorum should be at the upper range of the council's assessed options (c.1,100 dpa). There is a particular need to identify sufficient land for housing development in Tring to address a widening affordability gap and aging population profile; a minimum of 2,100 dwellings is required for the town. <p>On that basis, there is a clear case for land east of Tring to be allocated as a strategic urban extension to the town. The c.100ha site is in the sole control of Harrow Estates and represents a unique opportunity to provide up to 1400 dwellings with associated infrastructure and community facilities in a comprehensive, well-designed development applying best practice of sustainability and place-making principles.</p> <p>Harrow Estates Plc has instructed Turley and a range of technical consultants to undertake a detailed appraisal of sites Tr-H1, Tr-H2 and adjacent land lying immediately to the north comprising c.100 ha in total. Various documents have been produced to support their detailed representations to the issues and options consultation; collectively those reports demonstrate that:</p> <ul style="list-style-type: none"> • There is a need for the borough to accommodate at least 1,100 dpa in accordance with the Government's standardised methodology. Tring should accommodate a significant proportion of new housing commensurate with its status as a sustainable market town containing a full range of services. • More housing is required in Tring – to address the issues of a widening affordability gap and an aging population. • Sites Tr-H1, Tr-H2 and other land to the north are in the sole control of Harrow Estates Plc. Collectively they provide a unique opportunity to deliver a sustainable expansion of the town which could deliver c.1400 new dwellings, open space, a link road, community hub and associated facilities, SANGs and car parking. • Land east of Tring is in a highly sustainable location with access to the railway station, bus, cycle and pedestrian routes. The scale of opportunity enables sustainable objectives to be designed into the development which will follow key place-making principles, integrating into the existing settlement. <p>Further details are set out in the accompanying submission documents:</p> <ul style="list-style-type: none"> • Issues and Options Consultation Response • Vision Document • Local Needs Assessment • Sustainability Appraisal
Include files	Olivia Carr - Sustainability Appraisal & Vision Document - combined
Number	Question 46
ID	LPIO22471

Full Name	Paul and Gillian Jenkins
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 strongly object to the development of site BE-h3 at Ivy House Lane and agree with the written statements submitted by Phillip Jones [REDACTED] and Lise-lotte & Henrik Hansen of [REDACTED] (attached).</p> <p>In addition to the attached statements, we would like to emphasise the following points:</p> <p>There is no access to the site other than from Ivy House Lane, which, for the most part, is a single track lane just 2.4m wide with limited passing places.</p> <p>From the proposed development traffic might turn right and towards the narrow railway bridge near Sunnyside Church and then on to either Bank Mill and the even narrower canal bridge or George Street which is almost always double-parked. Either route would result in chaos.</p> <p>Ivy House Lane is simply not capable of servicing the development of this site.</p> <p>Alternatively but less likely, the traffic would turn left up to The Common turning left and left again down Gravel Path which is already a busy and somewhat dangerous cut-through to the station and the High Street. To reach either destination the traffic would need to cross another single-lane and weight-restricted bridge.</p> <p>The developers, we would imagine, will suggest that any development of this site will be some ecological utopia which will buck the national trend of increased car ownership and growing home deliveries and will be serviced a short-cycle path and public transport. Any suggestion along these lines ignores the reality of today's lifestyles.</p> <p>We are concerned that the infrastructure of Berkhamsted cannot support development on the scale suggested in the consultation document. The water supply to houses along Gravel Path is unreliable and the recent spate of burst mains would suggest that it is literally at breaking point. Rainwater drainage is appalling and would only get worse if more farmland is built upon, the roads are falling apart and parking in the town centre is a well-known and widely acknowledged problem.</p> <p>The site itself is farmland adjoining an AONB and part of the existing green belt. There is a surveyor's report suggesting that development of this site would make the green belt "more defensible" the irony of building on farmland to defend the green belt would not be lost on anyone other than people with questionable motives. The farmland is an amenity enjoyed by the surrounding houses and the wider community and must be protected.</p> <p>The same report suggests that a landscaped buffer would screen the views of the Houses in Gravel Path.</p>

Giving the steep slope of the site the screen would need to be impossibly tall for it not to be ineffective.

Philip Jones response:

A Objection STATUS

A.1 This written statement is submitted by Philip Jones [REDACTED] Berkhamsted. I represent the views of 20 out of 21 houses on Hunters Park and my comments set out below reflect the views of residents (see Attachment A) and issues raised at our meeting on Thursday November 9 2017.

A.2 I am also in communication with nine residents of Ivy House Lane most affected by the traffic issues associated with the proposal. These are the houses broadly between the Meadway junction and the subject site. I have met with two of the residents who have raised similar objections to our own. Likewise I am aware that at least two residents from the northern edge of the field will be making similar objections, the nature of which will be set out below.

B The site

B.1 The site is a rectangular field which has been sown annually for at least the past 30 years with winter maturing seed and is completely open in character immediately to the rear of Hunters Park down to Ivy House Lane. This field immediately adjoins Hunters Park houses' rear gardens and is very visible to all the residents. Access to the site can only be made from Ivy House Lane. The site is not only visible to the immediately surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic advantage points. Hedges and mature trees generally define the southern and northern boundaries. Domestic fences and shrubs mark the western boundary. There is no substantial hedge or vegetation along the eastern boundary with Ivy House Lane (as described in the 2002 Inspectors Report). The land dips steeply into the middle on both sides and during wet weather the lane floods at the bottom as a consequence of surface water run-off. In winter Ivy House Lane is icy and with snow is impassable without a four wheel drive car.

B.2 Ivy House Lane at the eastern side of the field is 2.4m (8 ft) in width with limited passing places. There is no left hand visibility at the Meadway junction. Ivy House Lane eventually joins the Common at the north end. Below Meadway it widens near Sunnyside Church and the allotments, and then the lane narrows over a railway bridge to a width of 4m (13 ft) which does not allow two vehicles to pass in opposite directions. After the bridge there is access to Bank Mill but there are often issues with delivery vehicles passing parked cars and more generally both along Bank Mill and Ivy House Lane, where there has been construction even relating to a single dwelling, when the road has been blocked by both delivery and construction vehicles

B.3 Thereafter using access to Bank Mill Lane, there is a canal bridge, again with single width carriageway with a width of only 3.2m (10ft 5"). Access is also

available to George Street, however both sides of the road are largely populated by parked vehicles and therefore manoeuvrability in two directions is impossible for most of the day.

B.4 There is no public transport in Ivy House Lane. There are no footpaths in Ivy House Lane and there is limited street lighting only in the lower half of the lane. The lane is rural in character beyond Meadway junction and has no intrusive lamp lighting or other urban road furniture. Also there are no dedicated cycle ways near the site.

B.5 It should be noted Meadway is a private road with a width restriction at the eastern entrance and at the western entrance does not offer a safe and suitable access to Gravel Path.

B.6 There are few bus services on this side of the town. There is a bus operator known as "Little Jims", which operates route 532 from Hemel Hempstead to Northchurch and the nearest stop is adjacent to Castle Village (0.3 miles away) which is to the west of the top of Gravel Path. There are three services a day with the first outbound at 9:35 am, then 12:05 pm and the last at 15:25 pm and none on Sunday. There is no suitable pedestrian access to Castle Village directly from the subject site and would involve going along unsurfaced or non-existent footpaths and there is no bus lay-by or covered shelter in the vicinity of the Gravel Path road junction. Timing of the present bus schedule would not enable any use to be made during term time or for going to work or easy access to the railway station or the town for those that work locally.

C Dacorum Plan Proposals and Considerations

C.1 Some of the key documents issued by Dacorum Borough Council have been examined, in particular in relation to this site. There is a conflict of opinion between their assessment and previous assessments on this site. The Council Sustainability Appraisal and the report by TRL are, we consider, fundamentally flawed. There is no numerical credit rating given to the various features of the site as weighed against other potential sites given the issues of isolation from the town and the need for car related journeys through narrow roads.

C.2 There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. Certainly we regard this to be the case in respect of the Ivy House Lane proposal. The sustainability conclusion is that the site is generally poorly related to local facilities owing to its valley side location and existing gradient and would discourage walking and cycling. There is a surface water run off issue to be addressed which has been identified but the transportation and highway issues together with the loss of Green Belt in this particular location have not been weighed heavily enough against other sites which are more suitable. Referring to the TRL report of October 2017, we propose to address each of the points as follows:-

1 Biodiversity

This is acknowledged to be a potential problem and loss of habitat.

1 **Water**

2 There is no commentary about the existence of main services and our suspicion is that main services would have to be brought into this site as it is known that the existing housing in Ivy House Lane only provided for the current level of development.

3 There is no public sewer in Ivy House Lane and existing houses are served by soakaway. There is a six inch foul sewer which runs from Hunters Park through the valley but because it cannot cope with current volumes it frequently causes blockages in connecting pipes in Hunters Park and would be inadequate in its size to cope with the additional proposed development of up to 150 units.

4 **Flood Risk**

The central area of the field already floods during wet periods and we suspect that the acreage, if it were developed, would have to be substantially reduced to allow for a balancing lake at a low point in the land to collect the surface water run-off. This would reduce the net developable area substantially, possibly taking up a large area of land which would have to be fenced off for safety reasons.

1 **Climate Change**

This refers to buses within 300 metres (should be 0.3 miles?) of the site, however, the service is too infrequent to serve the number of proposed dwellings or to deal with traffic movements. It is likely that all the residents would be car users and those that aren't would be isolated by the fact of there being no public footpaths within the vicinity affecting walking to the nearest bus stop and certainly no safe access for schools for children.

1 **Air Quality**

Undoubtedly the site would diminish the air quality that is currently enjoyed due to the inaccessibility of public transport and the contours involved in the adjoining roads.

1 **Soil**

No comment at this stage

1 **Resource Efficiency**

No comment at this stage

1 **Historic Environment**

The site does not have any historic significance but the boundaries of the Green Belt in this area have been effectively maintained since 1947.

1 **Landscape**

Development of this prominent site would expand Berkhamsted into the countryside on the east edge of the town is acknowledged. The site is also immediately opposite the Chilterns Area of Outstanding Natural Beauty (AONB) and there is an argument regarding the setting of this. However loss of amenity to existing residents is not mentioned and is a factor to consider in

this particular case. Furthermore the Council have failed to recognise its own established Residential Area Character Study carried forward from the last District Plan which identified that the area is characterised by low density detached housing. A rough estimate by Hunters Park residents is that if the subject site were developed to the same density it would only support the development of 45 houses and not 150 houses. Proposals by Dacorum Borough Council for affordable housing would therefore be a very dense level at 40% of the site effectively getting on for half the site area and because of this very built urban form of terraced and flatted development would result in a large chunk of visual intrusion being added to what is a semi-rural area at present, notwithstanding the traffic and other problems likely to be associated with it. These factors relating to density and design constraints have been totally ignored in the analysis.

1 Health and Wellbeing

The site does not offer immediate access to schools, railway station or town centre and would undoubtedly result in car traffic using a single width lane without footpaths, with dangerous railway and canal bridges and generally filtering through the existing unsustainable road network. This site together with the allotments at the foot of Ivy House Lane, were rejected in the last District Plan enquiry of Dacorum Borough Council by an Inspector.

1 Sustainability

It is acknowledged that the site has poor accessibility to local facilities especially primary schools. The nearest primary school is at Swing Gate Lane which would involve walking along Ivy House Lane, then George Street and across the Canal into Greene Walk and then onto the school. The only other method of getting to the school would be via car transport either crossing over the narrow canal bridge at Bank Mill or at the end of heavily congested George Street and then the busy tight canal bridge on Gravel Path.

Secondary schools in Berkhamsted, other than part of Berkhamsted School, are all located on the southern side of the town which is better served with road access both to the A41 bypass and to the High Street and facilities. Bus service access is superior on the southern side of the town. Other sites identified are offering improvements to these facilities on the south side of the town.

1 Community Cohesion

It is unclear what type of community would and could be developed in this relatively isolated location and how it could relate to either, the immediately surrounding development or, the facilities in the town to represent a sustainable form of development. It would be either, higher density thereby making better use of the land and providing affordable homes but generating significant traffic in an unsustainable location putting pressure on facilities where it is not in a location to deliver any or, it would be lower density and therefore not justify the loss of this Green Belt site.

Currently the primary driver for the town population is to find work elsewhere and use it as a commuter dormitory which is largely what has happened for the last 20-30 years. The consequence of this is that access to the station and to bus services is more crucial in terms of sustainability than previous and therefore the Council should give priority to those sites which are better located.

1 Housing

It is questionable in design terms that the proposed density could be achieved without major detrimental visual impact and has randomly ignored the design constraints of this edge of town location. Further consideration of this location is inappropriate for the reasons already stated.

1 Economy

This scheme will not achieve any more than would be offered elsewhere in the Dacorum Area.

1 Employment

This development will do nothing for developing the skills of Berkhamsted. Access to broadband is an issue in this area and there would be no improvement to local education or services and just more delivery traffic. This section could be applied to any site and is not site specific and therefore irrelevant and inappropriate in such a detailed consideration.

Conclusion on Superficial Analysis

From the Council summation of the Ivy House site located at pages 44-47 of the Schedule of Site Appraisals October 2017, the only suggestion the promoter has made is to improve cycle/footpath links and the whole question of new infrastructure provision is totally ignored. Their submission lacks the credibility, deliverability and cohesion of other sites offered in the "Call for Sites".

D Conclusion

- 1 Development of the site will result in loss of regularly cultivated arable land in an unsustainable location with poor road access and out of character with adjoining developments.
- 2 The proposal to put 40% affordable housing on the land would result in an inappropriate very dense form of development which would be both contrary to the established policy of edge of Green Belt settlement and the existing Residential Area Character Study. We consider there are grounds to include this land within AONB which adjoins it.
- 3 A balancing lake and improved drainage would be required to the site to prevent the lane from flooding further than it does at present. There is also a question over the availability of adjoining services including sewerage.
- 4 The highway infrastructure locally prohibits any substantial development and promoters are not in control of the necessary land to be able to bring about any significant improvements. Even if they were to do so this would destroy the character of the lane and bring in lighting and other forms of

urban development which would jar with the existing soft edge to the town.

- 5 We consider that the current studies undertaken by Dacorum Borough Council are superficial, biased and inadequate and that there are other sites being offered where sustainability issues could be better addressed with less impact on the Green Belt.

Lise-Lotte & Henrik Hansen response:

We strongly disagree with the way this consultation has been done by preparing such an extensive document that most people struggle to understand unless they have prior knowledge or expertise in this area. It is neither fair nor realistic to expect people to respond to 46 questions in 6 weeks – especially the 6 weeks leading up to Christmas. The developers have had access to and have had meetings with members of the planning department for months prior to the public consultation and the timing and number of questions seem to have been designed with a view to put people off responding.

We believe the Green Belt Review is fundamentally flawed. Any adjustments in Green Belt should have been completed before deciding which sites to consider for further housing development. The TRL assessment of individual sites is superficial, biased, lacks any real analysis of the impact development has on the specific area in which they are situated and is on several accounts simply wrong. Development on Green Belt cannot offer any net environmental improvements, - the net effect can only be negative regardless of size. Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Review produced by consultants whose vague reasoning is completely at odds with the current Green Belt policy.

Asking developers to put sites forward is ineffective and unprofessional. Their primary incentive is naturally to propose sites that will maximise their profitability. This plan has not looked at the constraints of Berkhamsted in relation to the valley topography, existing infrastructure, the demographics and what kind of need there is for housing. The sites put forward do not offer efficient or appropriate building of houses for Berkhamsted, nor does it take into consideration the character of the town or the current access to green areas. Berkhamsted does not have the infrastructure nor the capacity to improve the infrastructure to accommodate the proposed, excessive growth.

The current 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 have put these very same sites forward for development. Many of the sites now proposed are specially identified in the Berkhamsted Vision Diagram as being "Sensitive Valley Sides". The reasons previously given for rejection still hold good.

The Urban Design Assessment (UDA) highlights that the valley form allows for a number of scenic views across the valley sides and stresses the need to

safeguard these views across the valley. Should Be-h3 Land at Ivy House Lane be developed these views will be lost forever.

Be-h3 Land at Ivy House Lane

The field at Ivy House Lane has been agricultural land for more than 30 years. Development of the site will result in loss of valuable regularly cultivated arable land.

The land is not only visible to the residents adjacent to the site but due to its high level of openness, provides distant views from as far away as the valley at Westbrook Hay and other notable vantage points. It is open in character and there is no substantial hedge or vegetation along the boundary with Ivy House Lane.

The AONB is currently separated from the development at Hunters Park by this open agricultural area. Due to the nature of topography adding any kind of screening cannot be effective. It is not the width of any added landscaping but the height that is the key issue and it is unrealistic to state that any development will not have an adverse landscape effect on the setting of the Chilterns AONB. This site has been rejected in several past inquiries and as recent as 2012. In the past the inspector stated: "As there is no screening along the eastern boundary of the objection site there is a strong visual and physical link between the site and the open countryside to the east. I consider, therefore, that the development of the site would have a detrimental impact on the attractive landscape to the east. In my view, it would visually encroach into the adjoining countryside contrary to the main purpose of the Green Belt."

This field can only be accessed from Ivy House Lane, a narrow single lane with limited passing places. At the North end it joins the Common, a dangerous road where the speed limit has been reduced to 40mph due to the number of accidents in recent years. Despite the reduced speed limit the junction undoubtedly remains hazardous. From there travel into Berkhamsted town centre would either be via Gravel Path or New Road. Gravel Path is a narrow, winding road with a weak single lane bridge and is already struggling to cope with the current traffic load. The amount of traffic and speed has long been a concern of local residents and Safer Gravel Path Action Group has been campaigning for years for a safer Gravel Path. New Road enters the town via two single lanes beneath the tracks both with severe height restrictions and they get extremely busy daily.

At the South end there is a junction with Meadway, a private road, with limited visibility at the junction and the road then widens briefly until the lane narrows after Sunnyside church by the railway bridge where it again becomes single lane. At both Bank Mill and George Street the roads are extremely narrow due to the lack of off road parking making both roads virtually single lane. At Bank Mill the road has a sharp turn with low visibility before crossing the canal over a narrow bridge.

There is no public transport on Ivy House Lane. The nearest bus is at least 600m away and the bus serving this area departs 3 times a day from Castle Village though not on Sunday's where there is no service. The service is not suitable for anyone working in town or

commuting from Berkhamsted Train Station. A large proportion of Berkhamsted residents already live within ten minutes of a bus stop and generally the services to the town centre are good but usage remains low. Creating an additional bus stop or a more frequent bus service will not change this.

Access to the bus stop would initially involve walking along a narrow single lane with no footpaths. Building additional footpath is not feasible and suggestions that residents will walk to and from the town on any pathway provided is highly unlikely due to the gradient and distance between the site and the town centre. There are no dedicated cycling lanes anywhere near the site and it would not make any sense to add any as it would not encourage people to cycle due to the very long and steep gradient to location of the site. Hertfordshire County Council prepared a Bikeability Audit Report on Berkhamsted in 2013 where it stated the following: "Cycling on Gravel Path is hazardous, especially on the ascent and becomes a Level 3+ (Roads not recommended for cycling) due to its steep ascent and subsequent slow speed of cyclists on the narrow carriageway". Berkhamsted is characterized by steep gradients, which constitute a major barrier to cycling in the town. In certain locations (Gravel Path, Chesham Road, Bridle Way and Swing Gate Lane) gradients are such that the implementation of specific cycle measures would prove futile". Ivy House Lane displays similar gradient as Gravel Path and the reports findings will apply to Ivy House Lane too.

The land is some distance from Berkhamsted railway station. How it was measured to be 1km from the railway line is questionable as the shortest route was 1.76km when we walked it from Ivy House Lane.

It is clear that any sustainable travel aspirations are not viable and as the site has poor accessibility to local facilities (including schools, GPs, town centre and shops) it will cause a significant increase in car usage leading to even more congestion and pollution. It is disheartening that a market town like Berkhamsted already has issues with poor air quality in certain areas. Building more housing in areas where sustainable travel is impossible will add to the existing problems and exacerbate existing issues with air pollution.

The field is a natural habitat for local wildlife such as deer, muntjacs, badgers, foxes, hares, bats, ducks, pheasants, owl, woodpeckers, thrushes, blackbirds, robins, swallows and heron etc. The loss of habitat to this wildlife and the effect of pollution on night flying fauna should not be ignored.

Water supply in the area has been subject to frequent repairs along Gravel Path. In the past 4 months the road has been closed 3 times 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 apparently due to low pressure, and adding 125-150 new houses will further stress the water supply.

	<p>The development will have an impact on the valley sides and it is an important dry valley location. The central area already floods during wet periods.</p> <p>Due to the valley shape nature of Berkhamsted there is little open space within the town centre itself and the Green Belt is part of the inherent character. Green Belt and AONB provide recreational space for local residents and Ivy House Lane is currently an access point to these areas. Due to limited access and the road being a single lane track, there is very modest traffic and the people of Berkhamsted walk there in order to gain access to AONB and other green areas. People would be unable to continue to enjoy this if the development went ahead because of the sheer amount of traffic generated by it. Adding a playground or incorporating any green open space does not replace green belt and the majority of residents in Berkhamsted will not be able to make use of it. Developing the proposed site will impact the health and wellbeing of local residents and have a strong negative effect on the existing inhabitants and the environment. We strongly disagree with the statement made by TRL that: "Providing additional housing and contributions toward wider infrastructure improvements for the town, development at this site could help to maintain community vibrancy and vitality." This statement and many others confirm that the review of the green belt undertaken by TRL is fundamentally biased. The town is both vital and vibrant as shown by the large number of restaurants, public houses, sports and social clubs. I see no exceptional circumstances justifying that the greenbelt boundaries should be altered.</p> <p>As residents on Hunters Park, I can confirm that we have been approached by a developer wanting an option to buy our house in order to gain access to the site from Hunters Park. We have informed the developer that we are not interested.</p>
Include files	
Number	Question 46
ID	LPIO22472
Full Name	Mr & Mrs Wotherspoon
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 write to object to the potential development in the Ivy House Lane field. Our views are those of Mr and Mrs Ostle and their letter of 13/12 17. We agree fully with their position and agree with all they say (see below):</p> <p>We have been resident [REDACTED].</p> <p>Berkhamsted is an old market town at the bottom of a fairly steep valley. As such routes of communication</p>

already result in very significant bottlenecks and congestion in the town centre. There is also severe shortage of reasonable parking space for residents, shoppers and commuters. The existing traffic congestion and the steep slopes on two sides of the town results in sub optimal air quality and noticeable traffic fumes at certain times of the day and climatic condition. This is detrimental to the people who work there as well as shoppers and children. There is already a shortage of doctors' surgeries, and schools are reportedly at capacity, and local hospital facilities have been significantly reduced.

There has already been a large increase in the number of residencies in Berkhamsted and a significant number more are already planned. Berkhamsted is well ahead of its 10 year building plan, whereas other areas of Dacorum are well below. It seems only right that these areas should catch up with their Programmes before extra requirements are forced on areas that have already done more than their proportionate share.

Comments relating to Be-h3 Ivy House Lane

We agree with learned views expressed by Neil Aitchison BSc FRICS, Sharon Van Vlymen, Philip Jones and Bruce Morris representing respectively the majority of all residents of Ivy House Lane, Meadway, Hunters Park and the bridletrack off Gravel Path commonly known as the Common.

Our very specific objections to development in this area are;

A] Greenbelt and AONB. The proposal would result in high density housing built on Greenbelt immediately adjoining an area of the Chiltern AONB. The conspicuous position of the proposed site at the head of a dry Chiltern Valley would result in considerable injury to the visual amenities of the Greenbelt and AONB which would appear to be in direct conflict with the Planning Policy Guidance, and Planning Inspectorates [DoE Bristol] findings since May 1991. Furthermore, the Council appear to have omitted to recognize the findings of their own Residential Area Character Study which identified that the area around this proposed Greenbelt site and adjoining AONB was characterised by low density detached housing, in essence producing the 'soft' boundary between urban and rural areas that the Council have pursued. There is no doubt that the proposal would also unacceptably harm the character and appearance of the whole area.

B] Scenic and rural surroundings and boundary. The surrounding area of rural undulating hills would be significantly and detrimentally affected and it would not be practical to avoid a hard boundary between the AONB and the proposed development. This is directly contrary to previous Dacorum Planning Depts stated objectives of maintaining a soft boundary between the urban development and the surrounding sensitive area. The Planning Dept have re-iterated this objective several times since the late 1980's up to recently, and it has been upheld by the National Planning Inspectorate of the DOE. Further References and related matter can be supplied – please advise if required.

C] Road Access. Ivy House Lane is generally a single carriageway lane and over a lot of its length either borders or runs through AONB. The road frequently gets into very bad condition, and has severe restrictions over the railway and canal bridges. Much of the road has been recently impassable for several days to all but experienced drivers in proper 4x 4 vehicles because of the steep slopes, snow and ice and assumed lack of access for ploughing or gritting. Significant improvement to Ivy House Lane will significantly affect the rural nature of this outermost boundary of the town and the AONB. Access to the proposed site from other directions, even if achievable, will all result in a very considerable increase in traffic on Gravel Path.

D] Traffic. Berkhamsted is already very congested, and Gravel Path, the crossroads at the top of Gravel Path, and the Potten End Road are particularly busy already, especially when people, deer

and other wide life also widely use parts of the area. The unmade bridle path, traditionally known as the Common and also believed to be within the AONB, is already frequently used as a potentially dangerous rat run with drivers wanting to avoid delays at the cross roads. It will be difficult to improve either Gravel Path or the Potten End Road without significantly detracting from their rural nature and their softening of the urban and AONB boundaries. Even if the Potten End Road and crossroads were improved much traffic would have to use New Road which for much of its length is now a potentially dangerous single carriageway because of station parking along its length. It is understood that further development is already planned between Potten End and Hemel, and once completed this in itself will cause an increase in general and commuter traffic. Any further increase will cause huge traffic problems, will be to the serious detriment of the environment, local citizens and wildlife.

The lower town end of Ivy House Lane goes over a restricted railway bridge and thence either to George Street or Bank Mill both of which are effectively only narrow single carriageways because of parking, and the latter runs over an extremely limited access traditional canal bridge.

E] Wildlife. There are frequently deer on the agricultural land of which this Greenbelt site comprises. There are also 2 badger sets, of which at least one is very active, on the wooded banks in the fields of the AONB directly opposite. The badgers frequently forage in the field where the development is being considered and regularly use the field to access the gardens of local residents, including ourselves. Red Kite are now frequently seen above the field looking for carrion, and other smaller birds are numerous. It is difficult to see how the proposed development would help the existing diversity of wild life, and it is probable that the increased traffic, urbanization and potential cat population would decimate what is currently there.

F] Non-vehicular Access and Sustainability. We find the proposal to install a cycle track laudable but laughable. The site is in a steep sided valley, and further the

	<p>proposed site access to or from the town is then down another steep hill, or back up it. Also a sufficient route into or away from the site would require large amounts of already congested land to be purchased and allocated. It would appear the cycle track offer by one of the potential developers is merely an unrealistic [and probably cynical] attempt to tick some more boxes. In order to gain access to or from the town or elsewhere it is highly probable that the large majority of journeys will be made by car or delivery vehicle, and thus exasperate the problems described in sections [C] Road Access and [D] Traffic above.</p> <p>Access to schools for children would be a particular issue made worse by the current shortage of footpaths and the topography. The nearest current primary schools are at Swing Gate Lane or Potten End. Both would result in extremely tortuous routes via already congested areas and bottlenecks, and would require the crossing, then walking along, of roads with fast moving traffic.</p> <p>G] Public Transport. There is no public transport in Ivy House Lane, and there are no bus stop pull ins or other amenities within a realistic walking distance bearing in mind the lack of any footpaths and the topography of the area.</p> <p>H] Farmland. In addition to being in the Green Belt and adjoin the AONB, the proposed site at Ivy House Lane has been under continuous agriculture for many years – probably many hundreds of years or even millennia. Government Policy is stated to support an increase in domestic agriculture and any proposal to build on such land appears entirely contradictory.</p>
Include files	
Number	Question 46
ID	LPIO22527
Full Name	Mr & Mrs Lisa-Lotte & Henrik Hansen
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 below our response to the new Local Plan consultation. I fully support Brag’s response on this matter (see below)</p> <p>General Comment:</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 and 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 (the results have been published in the DBC Green Belt Review of EDSM (http://www.dacorum.gov.uk/2016/07/20/dacorum-green-belt-review-of-edsm/ 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 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

Please see separate response.

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
 - 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.

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
 - 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 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
 - 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	BRAG response to Issues Options.pdf
Number	Question 46
ID	LPIO22577
Full Name	Mrs C Longbottom
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 wish to object to all the Berkhamsted sites and specifically the h3 Ivy House Lane site</p> <p>I support all answers and comments to the Issues & Options Consultation document noted on the Berkhamsted Town Council website</p> <p>My main points relating to the Ivy House Lane site on which I feel strongly are;</p> <ol style="list-style-type: none"> 1 Removal of fertile land from food production which directly affects both employment and erodes the economic scale of local farming 2 This very steep sloping site is on the fringes of the town and is in a highly unsustainable location. Any development will destroy both animal habitat and the protective edge of the Chiltern Area of Outstanding Natural Beauty to which it is adjoined. Spectacular views along the valley will be denied to future generations 3 Speed and safety issues along narrow, twisting and steep Gravel Path, which is the likely main route into town for this site, would be aggravated by any increased traffic from this proposed development 4 There is an existing lack of capacity in Berkhamsted's public services doctors, dentists, schools, railway, buses, parking, broadband, water and sewerage so it is difficult to appreciate how any development could improve the local economy 5 Site access, particularly for construction traffic and residents, is a critical issue as all road approaches to and from the town are constrained by width and weight restricted bridges and tunnels which are height restricted. Unless this access is de-bottlenecked no development should be allowed <p>Be-h1; Land south of Berkhamsted</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</p>

preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment. An important transition area between the town and open countryside would be damaged.

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

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

Be-h3; Land at Ivy House Lane

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

The hill top location of this site means that cars will be the main mode of transport. But there is inadequate access. Access from Meadway is not possible as it is a private road. Access from Hunters Park would only be possible by demolishing a house. The capacity of Ivy House Lane cannot support this development which would require significant structural changes.

Enhancements will not just be necessary for Ivy House Lane but also the railway bridge at the bottom of the Lane. This would cause a substantial increase in traffic congestion on already congested neighbouring roads (particularly George Street , Bank Mill, Bank Mill Lane, Gravel Path, Station Road, Ravens Lane, and the High Street) putting a strain on local infrastructure.

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

There would 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.

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

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

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

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

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

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

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

This site falls within an area of Archaeological significance.

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

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

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

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

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

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

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

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

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

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

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

Be-h7; Land at Bank Mill Lane

The site lies in a zone of flood risk.

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

	<p>road traffic would add to any congestion on the Swing Gate Lane roundabout caused by new traffic to and from "South Berkhamsted."</p> <p>The density is too high for the neighbouring Character Area.</p> <p>Be-h8; Berkhamsted Golf Range, The Brickworks, Spring Garden Lane</p> <p>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.</p> <p>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.</p> <p>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</p>
Include files	
Number	Question 46
ID	LPIO22596
Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	
Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>On behalf of The Berkhamsted Schools Group, we support the proposed allocation of the Haslam Fields site (Site Ref Be-H2). The Planning Justification Document submitted in support of the proposed allocation sets out the detailed planning case for the release of Haslam Fields from the Green Belt and its allocation and development for housing together with the relocation of the existing sports provision to an enhanced facility adjoining the Haresfoot Campus.</p> <p>The allocation of Haslam Fields is considered to be acceptable in planning terms, for the reasons summarised below:-</p> <p>The Council has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.</p>

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should plan for a minimum of 756 dpa. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers Dacorum Council will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate green belt releases. We consider that the Schools land at Haslam Fields is the most suitable future housing allocation from the green belt in Berkhamsted.

House prices in the Dacorum Council area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to provide up to 40 well designed affordable homes, for which there is a local need.

The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication of the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

It is evident that Dacorum Borough Council will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five green belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was

judged to have the “Weakest” category outcome. It is clear from the phase 2 green belt study that the Schools land in this area is the most suitable of any green belt releases in Berkhamsted.

The field to the rear is also owned by the Berkhamsted Schools Group and slopes down towards the A41. It is approximately 2.7 hectares in area and currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space with potential for a wildlife site/nature reserve/walking field if appropriate.

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to the Berkhamsted Pre-Prep School at the Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway, and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the green belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

The TGMS Equivalent Quality Assessment report & The School’s justification report submitted in support of the proposal allocation, demonstrate the problems with the existing Haslam site, and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The additional funds that would flow from this project would be used to enhance sporting facilities not only at the Haresfoot Campus but throughout the Berkhamsted Schools Group estate and will also result in wider educational and community benefits.

Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot. The pre-app response confirms that Sport England would support the principle of the proposal which would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

EXECUTIVE SUMMARY

This Planning Justification Document has been prepared by Aitchison Raffety on behalf of the Berkhamsted Schools Group. It sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing, together with the relocation of the existing sports provision to an enhanced facility adjoining Haresfoot Campus.

The Proposals

The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway which has an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph).

Dacorum Borough Council (DBC) considers that the Haslam Fields site has an indicative capacity of 80-100 dwellings (21-26 dwellings per hectare), which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area.

The land is approximately 3.79 hectares in area and used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that it owns across the town. The field to the rear, also owned by the Berkhamsted Schools Group slopes down towards the A41. It is approximately 2.7 hectares in area and is currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof.

The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus. The Haresfoot land is approximately 5.88 hectares in area and comprises of a large field in agricultural use. Once the new sports provision has been laid out at Haresfoot and ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for the development of much needed housing.

The land at Haresfoot offers the opportunity to provide enhanced sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and also the wider community.

Significant contribution to Housing Land Supply

DBC has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that DBC should plan for a minimum of 756 dpa. However, DBC also needs to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers DBC will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate Green Belt releases. We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted.

Would help address the shortage of affordable homes

House prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to include up to 40 well designed affordable homes, for which there is a local need.

The school has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element at Haslam Fields.

Berkhamsted is an appropriate location for housing

We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in DBC, to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council's general hierarchical approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication as to the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

Site in a Sustainable Location

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

Appropriate Green Belt Release

It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five Green Belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the "Weakest" category outcome. It is clear from the phase 2 green belt study that the School's land in this area is the most suitable of any Green Belt releases in Berkhamsted.

Technical aspects

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the

surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

Relocated and Enhanced Sports Provision

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

Pre-application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre-App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Other reports from a specialist sports consultant TGMS and from The School, that we have included in support of the proposed allocation, also demonstrate the problems with the existing Haslam site and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The funds that would flow from this project would be used to enhance sporting and education facilities throughout the Berkhamsted Schools Group estate and be of wider community benefit.

Overall Recommendation

For the reasons set out in this Planning Justification Document and the supporting reports and in our separate detailed response to the current Issues & Options consultation, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan, with the existing playing pitch provision relocated to the Haresfoot Campus.

Introduction

- This document has been prepared by Aitchison Raffety, on behalf of the Berkhamsted Schools Group.
- The report relates to two land holdings, both owned by Berkhamsted Schools Group, located close to each other in Berkhamsted. The two areas are; land known as Haslam Fields (and land to the rear), Shootersway, Berkhamsted and secondly land adjacent to the Haresfoot Campus.
- This report sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing. To facilitate the development of the land for housing, it is proposed that the existing playing pitches be relocated to a site adjacent to the Haresfoot Campus. A plan summarising the proposal is provided below:
- This Planning Justification Document should be read in conjunction with the following reports, which provide additional information in support of the proposals; Equivalent Quality Assessment report (three stages) by TGMS Ltd, Sports Surface Consultants, dated 31st October 2015 (Revision 5, 23rd October 2017) Appendix 2 and a Justification Report by The Berkhamsted Schools Group dated October 2017, Appendix 3
- The aforementioned TGMS equivalent quality assessment report has been carried out in accordance with Sport England's Briefing Note 'Equivalent Quality Assessment of Natural Turf Pitches, August 2015.
- The School has also had commissioned various technical reports by consultants including transport, ecology and trees. All the reports confirm that there are no technical constraints to this proposed housing allocation.
- The School will be submitting specific detailed representations to DBC's emerging single local plan via the public consultation process starting with this Issues & Options consultation entitled "Shaping Growth in Dacorum".

The Proposals

Haslam Fields – Proposed Housing allocation

- The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It adjoins existing residential development on Shootersway to the North East and on Denny's Lane to the North West. The site is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway, Berkhamsted, which is a fully allocated site, not in the Green Belt and with

an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph)

- In terms of topography, the site of the proposed housing allocation is generally flat. The field to the rear also owned by the Berkhamsted Schools Group slopes down towards the A41. There are no trees within the main core of the site although the Northern and Western boundaries benefit from wooded screens which limit views into the site from Shootersway and Denny's Lane.
- Vehicular access is currently provided via a crossover from Shootersway in the North-West corner of the site.
- The Haslam Fields land comprises approximately 3.79 hectares and is used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that they own across the town. It accommodates sports pitches and an athletics track, but has a number of serious inadequacies, which are set out in detail in the accompanying reports.
- This proposal seeks to allocate the Haslam Fields site for housing in the emerging single local plan. The site is in a sustainable location for housing, and is entirely suitable for residential development.
- The site has an indicative capacity of up to 80-100 dwellings, 21-26 dwellings per hectare, which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area. A plan of the Haslam Fields proposed housing allocation is provided below
- Further land owned by the School immediately to the rear of Haslam Fields is approximately 2.7 hectares and is currently in agricultural use. This land offers a good opportunity for biodiversity improvements such as public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof. Further details on this aspect of the proposal are covered later in this report and a plan is provided below
- Some of the DBC Issues & Options consultation documents refer to the potential linkage of this rear section of land as part of a larger possible housing allocation, together with the front Haslam Fields and other land not owned by the School enclosed by the A41 bypass and the A416. If the final decision of the Council or an Inspector is that the School's rear land should also form part of a larger housing allocation then the School would also support that possibility, but on the basis that it should not prejudice the prospects or delay the early release of Haslam Fields, which is a deliverable short term stand-alone proposition which would bring many benefits.
- ***Haresfoot Campus – Replacement Sports Provision.***
- The proposal is to relocate the existing sports facilities used by Berkhamsted School, from

Haslam Fields onto land adjacent to the Haresfoot Campus.

- The Haresfoot land in question is approximately 5.88 hectares in area and comprises of a large field in agricultural use, which is located to the South of Chesham Road, West of White Hill, and to the North East of the existing driveway to the school.
- The land is within the ownership of the Berkhamsted Schools
- Once the new sports provision has been laid out at Haresfoot and is ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for development of much needed housing.
- The new sports pitches at Haresfoot would be located within a larger area than the existing facility at Haslam Fields and are able to accommodate substantially more sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and therefore to the wider community.
- Indicative summer and winter layouts (2 alternative options) are attached at Appendix 1. Please note that these are indicative proposals at this stage to establish the principle of the overall proposal, detailed aspects are expected to be addressed during the subsequent planning applications phase.
- We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted. The detailed reasons for this are set out within this report.
- DBC has confirmed that the School's land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. As such, the site has the potential to make a significant contribution to the Council's housing land supply, in a sustainable location that is appropriate for housing growth. The National Planning Policy Framework places great weight on the need to provide sufficient housing. It focuses on the need to increase housing supply and makes it absolutely clear that we must house a rising population, which is living longer and who want to make new choices. Paragraph 47 states that local planning authorities should "boost significantly the supply of housing" and the proposal would provide a form of housing for which there is a clear need. The provision of sufficient "market" housing is a necessary component in meeting the social role of sustainable development, as defined at paragraph 7 of the NPPF.

Would help address the shortage of affordable homes

- It is acknowledged by all parties that house prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local

people. The proposed site offers an opportunity to provide well designed affordable housing for local people.

- Policy CS19 of the Dacorum Core Strategy sets a target of 35% of all new dwellings. The site has an indicative capacity of 80 to 100 dwellings in total, and at 35% provision would equate to 28 to 35 new affordable homes.
- It is acknowledged that some previous Green Belt releases have been allocated on the basis of 40% affordable housing provision. Based on the sites indicative capacity of 80-100 dwellings in total, 40% provision would equate to 32 to 40 new affordable homes. Any proposed development at Haslam Fields will be policy compliant in respect of affordable housing.
- The latest Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum. The analysis has been based on meeting affordable housing need over the 23-year period from 2013 to 2036.
- The table below shows the gross affordable housing completions that have been recorded in each of the past 5 years, giving an average of 164 affordable dwellings per annum. It demonstrates that past delivery has consistently been significantly below the identified need for affordable housing. Even if the Council achieves 35% affordable housing in respect of every new development over the plan period, there will still be a very significant shortfall of affordable housing in Dacorum.

YEAR

COMPLETIONS

AFFORDABLE HOUSING

NEED

SHORTFALL

2015/16

203

366

-163

2014/15

254

366

-112

2013/14

123

366

-243

2012/13

92

366

-274

2011/12

149

366

-217

5 year average annual rate of provision

164

366

-202

- Having regard to the above, it is considered that the provision of affordable housing, as part of the allocation and development of the site, should be afforded substantial weight in support of the proposal.
- To this end The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.
- It is also worth noting that the School experiences big issues recruiting staff due to high local house prices and part of any allocation at Haslam Fields could potentially be utilised for the provision of an element of staff accommodation which would be a benefit to sustainability.

Berkhamsted is an appropriate location for housing

- We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in Dacorum, to take an appropriate share of future housing growth.
- The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs".
- This approach is supported by Policy CS1 of the Core Strategy which relates to the distribution of development, and states that "The market towns and large villages will accommodate new development for housing... of a scale commensurate with the size of the settlement and the range of local services and facilities". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.
- In the original draft version of the Issues and Options consultation document submitted to Cabinet, DBC considered three options for the dispersal of housing numbers. These were; to concentrate growth at Hemel Hempstead only; spread growth across the three largest settlements of Hemel, Berkhamsted & Tring or to spread growth across the three towns and the larger villages.
- The conclusion was that the "suggested option" for consultation purposes was the option to spread growth across the Borough including the towns and larger villages. The School would support that

approach or alternatively an approach that includes growth at just the three largest towns including Berkhamsted. Berkhamsted is the second largest town and should take an appropriate share of growth and the benefits that can be derived from that.

- In the first draft consultation document the DBC officers rejected the proposition of growth only being applied to Hemel Hempstead and we strongly agree with DBC
- In the revised final version of the draft Issues and Options consultation document DBC is not stating any suggested option as to how to disperse growth. However it does state that the current settlement hierarchy in the adopted core strategy should remain and we strongly support this approach.
- We propose that DBC should reinstate its previous suggested approach as to how any final housing numbers should be spread or that any final option must include Berkhamsted as the second largest town.
- For its part, the Berkhamsted Schools Group has capacity and a desire to contribute to accommodating the additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

- The whole site (both elements) was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The Green Belt location was noted, but the site was formally accepted on the basis that it was suitable for development, subject to the findings of the Green Belt review being prepared in respect of the emerging Single Local Plan. The SHLAA notes that the playing field use would need to be relocated, and this forms part of the current proposal.
- The SHLAA assessment provides a very useful indication of the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight. The extract from the SHLAA is report is below

Site in a Sustainable Location

- During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. The site at Hanburys was designated for housing due to its sustainable location.
- As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.
- It is clear that the ultimate outcome of future testing of the Haslam Fields land will be the same as with the Hanburys site and it will, therefore, score very favourably compared to other proposals on the edge of Berkhamsted. The plan below shows the

proximity of the site to existing and allocated residential development, which demonstrates its sustainable location.

- The proposed Haslam site allocation is in an accessible location, on the edge of the existing built up area of Berkhamsted. The site is within easy reach of local shops and services, and the High Street is only 0.7 miles away, and can be reached by foot in 13 minutes and by cycle in only 3 minutes. All of the following can be easily accessed by foot or cycle
 - Mainline Railway Station;
 - High Street shops, cafes and restaurants; .
 - Three supermarkets (Tesco, M&S, Waitrose);
 - Sports facilities including a Leisure Centre;
 - Library, cinema, schools
- In the independent sustainability appraisal produced by consultants TRL, which accompanies the Issues & Options consultation document the site scores favourably overall compared to other green belt sites. We disagree with Table 1 of the Schedule of Site Appraisals where it states that the Haslam Fields site is not in a sustainable location. This is plainly wrong as the site is in an accessible location, within the existing built up area of Berkhamsted. As shown above it is within easy reach of local shops and services, and the High Street. It is considered that the site is a natural location for the expansion of Berkhamsted. We note that other sites have mistakenly been scored highly in respect of their location, even though they are no closer to the town centre.

Appropriate Green Belt Release

- It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted.
- The phase 1 Green Belt Study produced in 2013 identified a swathe of Green Belt land within which the Haslam Fields site is identified as site GB11. The relevant extract is below which confirms that the subject site is within a parcel that contributes least to the five Green Belt purposes:
- The phase 2 Green Belt study then focussed upon these least important areas and looked at smaller specific areas contained within.
- The Phase 2 Green Belt study was produced by independent consultants and was published in December 2016. The study tested sites across all relevant criteria and concluded by ranking them, in order of least importance to the green belt performance from “Weakest”, “Weakly”, “Moderately” and “Strongly”.
- The entire extent of the School’s land at Haslam Fields and to the rear was adjudged to be “weakest” defined as scoring weakly across all purposes. See Extract below:-

- It is important to note that the School's land is part of the only area in Berkhamsted that was judged to have the "Weakest" category outcome.
- Within the Phase 2 study the School's land has been assessed as part of a larger section of land, named area D-S2a, see plan below.
- The accompanying text associated with area D-S2a confirms that "...the A41 to the south and A416 to the east would provide the most logical southernmost extent for the built-up area of Berkhamsted and defensible new boundaries for the Green Belt".
- The phase 2 study also states that this "does not compromise the ability of the wider green belt to meet its purposes, nor is it judged to be highly sensitive to changes in landscape terms A number of possible new Green Belt boundaries have been identified, which could be taken into account in future assessment work".
- It is clear from the phase 2 green belt study that the School's land in this area is the most suitable of any green belt releases in Berkhamsted.
- Following on from the phase 2 Green Belt study DBC have undertaken the further assessment work recommended. This has included obtaining independent sustainability reports from consultants TRL and holding meetings with those parties such as ourselves that represent appropriate landowners to check upon availability and planning gain possibilities.
- The above work culminated in DBC producing the first draft of the Issues and Options consultation document for the Cabinet meeting on 19 September.
- As would have been expected due to the findings of all the above technical work, in this original proposed version of the consultation document the School's land at Haslam Fields was identified as a "suggested option", site Be-h2 for a potential housing allocation, for consultation purposes, see extract below.

BERKHAMSTED

Be-h2

Haslam Fields, Shootersway*

Key: *= Housing sites included within the "Suggested Option".

- It is very important to be clear that Haslam Fields is totally capable of being allocated as a separate smaller stand-alone allocation as put forward in the original version of the consultation document and with biodiversity enhancement at the rear.
- If however DBC or the local plan inspector ultimately determines that all the School's land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be

inappropriate and delay the flow of benefits that would arise.

- As stated previously, the original draft version of the Issues and Options document was not progressed due to the release of the government's consultation which has an impact upon future housing numbers and has created further uncertainty.
- Due to this uncertainty the revised and published version of the Issues & Options consultation document no longer includes any reference to "suggested options" and instead consultation is taking place on all possible sites that have been put forward by landowners, regardless of the DBC opinion about their suitability. We do not agree with this approach as clearly from DBC's own assessment and the views of their independent consultants some sites are considered more suitable than others and should be stated as such.
- The individual site assessments are still included within the independent consultants Sustainability Appraisal documents which form part of the public consultation process and the content remains the same. The suitability of the School land compared to other Green Belt sites remains clear from this document and from the previous version of the Issues & Options consultation draft produced by DBC officers.
- The Council have also released as part of the final consultation documents, a Schedule of Site Appraisals on all potential large greenfield sites. These pro-formas are based upon meetings held with DBC officers and upon the findings of the independent consultants and upon DBC officer opinion. The School's land is described as site Be-h2, Haslam Fields, Shootersway, pages 39-43.
- In conclusion, it is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required. The School's land at Haslam Fields is recognised as the most suitable option at Berkhamsted.

Technical aspects

- There are no technical constraints that would restrict the development of Haslam Fields.
- The School has obtained a Transport Statement (TS) prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. The modelling work in the TS confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will have some spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented,
- The position of the new access has been designed in a central location to the current frontage which

achieves safety requirements. A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective

- An ecological assessment was undertaken by Arbtech in July 2016. The Haslam Fields part of the site was assessed to hold negligible ecological value. The rear parcel of land could be used for biodiversity enhancement.
- Copies of these reports are also submitted to Dacorum Council

Opportunity for provision of Public Open Space and an Increase in Biodiversity

- Subject to discussions with DBC, the allocation and development of the Haslam Fields site for housing also offers the opportunity for a substantial area of new public open space of some form to be provided on the Schools land to the rear. The rear element is some 2.76 hectares in area and offers the potential for a nature reserve area, wildlife, walking field, open space or a combination to be provided if appropriate, which would result in a significant gain in biodiversity.
- The provision of public open space and measures to improve biodiversity could be secured through a planning condition, which would be effective in safeguarding the rear of the site from future development. The provision of these planning benefits is considered to provide weight in favour of the proposed allocation.
- The provision of public open space and measures to enhance biodiversity are matters that we would wish to discuss with DBC in further detail.
- Alternatively, if it is subsequently concluded by DBC or an Inspector that this rear land should also form part of a larger housing allocation including the front land and other landholdings, then the school would wish to discuss the appropriate uses of all or part of the rear land. Some opportunity for more limited biodiversity measures should still exist.

Relocated and Enhanced Sports Provision

- It is recognised that planning policy seeks to resist the loss of sports facilities. This is reflected in the relevant technical and consultation documents which state that the front part of Haslam Fields is suitable for housing development, subject to the relocation of the playing fields. To facilitate the development of the land for housing, it is therefore proposed that the existing playing pitches be relocated to a site adjacent to Haresfoot Campus. As there will be no loss of provision, the policy requirement is met.
- The proposed site at Haresfoot Campus is some 5.88 hectares in area, which is more than double the size of the existing pitches only at Haslam Fields (2.78 hectares).
- The sale proceeds from the Haslam Fields housing land would be used to directly fund the construction of the new sports facilities and also

to provide the necessary funds for ongoing maintenance.

- The existing facilities are predominantly used by the prep school with some limited ancillary use by Berkhamsted Raiders Football Club as a small part of their wider provision. The new relocated and enhanced facilities would still allow potential opportunities for links with local community groups and other schools to be explored when appropriate.
- The additional funds that would flow from this project would be used to enhance sporting facilities, not only at the Haresfoot Campus, but throughout the Berkhamsted Schools Group estate.
- The School is in the process of reviewing its future education needs and formulating a strategic property plan to look at specific opportunities across the campuses, to strengthen education provision as a whole. The Haslams/Haresfoot relocation is already established as a priority. The funds that flow from this project will play a vital part in ensuring that these longer-term needs can be met and will result in wide community benefits.
- The other reports referred to below, submitted in support of the proposed allocation, demonstrate the problems with the existing Haslam site and show the enhanced quality of sports provision that can be provided at the Haresfoot Campus.

Justification report produced by Berkhamsted School

- The detailed justification report produced by Berkhamsted School sets out the extent and nature of the current usage at Haslam Fields; identifies the problems encountered; assesses future needs and sets out the benefits of the project from a sport and education provision perspective. The key conclusions of which are as follows:
- The existing facilities at Haslam Fields are unable to support increasing demand for sport at the school and the sporting programmes they wish to implement. There is no scope for expansion at Haslam Fields so as a direct result students are missing opportunities to participate in sport across all ability
- The pitches are in constant use which in turn means that they are rarely rotated and unable to recover easily from excessive wear and surface
- The number of fixtures available will increase by 93% leading to an increase in participation frequency of 114%.
- The use of the pitches in the current location also has an impact upon local residents from car parking and traffic congestion on the local highway.
- The proposals not only replace the existing junior sports facilities at Haslam Fields but also provide the option for some additional pitch/match provision for older age groups as overflow to the Chesham Road playing fields which are heavily congested and prone to cancellation due to over use.

TGMS Ltd Report

- The TGMS Report provides an assessment of the quality of the sports pitches at the existing site. The clear conclusion, which is also clear from the School's direct experience, is that there are many practical issues with the existing facilities which impact upon effective usage. It makes clear that only half of the pitches comply with Sport England guidance.
- The report analyses the existing site and compares the current sports provision at Haslam Fields to the proposed replacement facilities at Haresfoot Campus, having regard to Sports England guidelines. The report concludes that there are many benefits achieved from the relocation.
- The full TGMS report is submitted for your information, but the executive summary provides a useful table (inserted below) which summarises the key improvements in provision. It shows that when assessed against Sports England guidelines, the proposed site represents a substantial improvement on the existing in the majority of areas, and is equivalent to the existing in the remaining areas. Sports England have been consulted and accept the reports contents (see later comment).

Relocation acceptable in Planning Terms

- It is clear from the above assessment that the School has the opportunity to provide significant improvements to its sports facilities by developing the new facilities at Haresfoot Campus. The land area available for sport will be doubled and the quality of facilities will go well beyond those currently at Haslam Fields.
- A move to Haresfoot Campus allows the potential to develop first class sports facilities for the School and this will in turn therefore benefit the local community.
- As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.
- The change also allows scope for visiting teams and parents to utilise the existing facilities at Haresfoot Campus for after match refreshments, as opposed to the current arduous practice of having to travel to another campus within the town after matches, with the impact and added congestion that entails.
- The level of facilities required can be accommodated fully at Haresfoot Campus and preliminary layouts are provided at Appendix 1. It should be noted that the majority of the proposal is for open grass pitches. There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. There is a small-scale pavilion which can be sensitively designed and appropriate areas for car parking.

Acceptable impact in Openness of Green Belt

- The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt.
- Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development within the Green Belt, subject to preserving openness. The provision of playing pitches will have no impact at all on openness.
- The proposed use is considered to be acceptable having regard to policy CS5 of the Core Strategy which relates to development within the Green Belt. It states that the Council will apply national Green Belt policy to protect the openness and character of the Green Belt, and that small scale development will be permitted for buildings defined as appropriate in national policy.
- The pavilion building would be located sympathetically, close to the existing buildings beyond the southern boundary of Haresfoot Campus. This would ensure built development remains concentrated to one area, maintaining the openness of the site as a whole. In addition, it would ensure that the pavilion is seen in context with the neighbouring buildings.
- In terms of design, the building would be constructed of natural materials and could be designed to have a barn like appearance (i.e. timber clad). This would give the building a rural appearance in- keeping with its Green Belt location.
- No obtrusive fencing would be erected on the site boundaries and no artificial lighting is proposed. Furthermore, no 3G pitches are proposed. During the summer months the sports track would simply be marked out on the grass, and the cricket nets would not incorporate an artificial surface.

Amenity of Residents

- The proposed sports use would not have an adverse impact upon the amenities of the occupiers of nearby properties.
- The immediate vicinity only contains a very small number of residential properties. Three dwellings are located adjacent to Chesham Road to the North West and one on While Hill to the North East. Given the expansive nature of the site, sports use would not harm the amenity of surrounding occupiers. Existing trees and landscaping will be maintained and also enhanced where appropriate. The final detailed layout for the sports pitches and ancillary facilities will be determined at subsequent planning application stage but the initial plans have been designed with a view to minimising any possible limited impact.
- No artificial lighting is proposed and therefore the proposed use would not harm the amenities of neighbours due to excessive light. The lack of floodlights will prevent sports uses taking place late in the evening.

- The site is sustainably located close to the A41 junction for Chesham and Berkhamsted. It is therefore in a highly accessible location where the existing road infrastructure is already capable of supporting the number of traffic movements associated with the sports pitches. In highway terms this is an improvement upon the situation at Haslam Fields which is problematical.

Planning policy support for improved sports provision at schools

- There is a clear link between outdoor sport and health and the Government seeks to encourage people to lead more active and healthier lives.
- Supports the provision of facilities for education and outdoor sport and the Government's objective to secure such facilities is a material factor in support of the proposed allocation.
- Paragraph 70 of the NPPF seeks to deliver a variety of social and recreational facilities and services and states that planning policies and decisions should "plan positively" for their provision and use.
- Paragraph 73 also advises that access to opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Paragraph 162 provides advice on the provision of infrastructure, which includes facilities for education.
- Paragraph 171 provides advice on the provision of facilities for health and well-being. It states that local planning authorities should understand and take account of the health status and needs of the local population, with specific reference to the provision of facilities for sport and recreation. The proposed development meets this objective.
- It is clear that National and local planning policies and guidance support the provision of facilities for outdoor sport and education, as summarised below:
 - **National Planning Policy Framework**
 - Our proposal results in a significant increase in participation being possible in sports and exercise, further details of which are contained within the School justification document.

Dacorum Borough Council Core Strategy

- Recognises the contribution of the education sector to the provision of jobs within Dacorum. The improved sports pitches are part of a number of measures that would assist the School in attracting and retaining pupils and this would safeguard the range of employment opportunities which exist at the Berkhamsted School Group
- Paragraph 15.1 of the Core Strategy states that the well-being of Dacorum's communities depends on having the appropriate 'social infrastructure'. Figure 14 confirms that social infrastructure includes education facilities and also facilities for outdoor leisure and sport.

- Paragraph 15.11 of the core strategy recognises that the private sector has a strong presence in the borough and “plays an important role in providing independent school places”. The improved sports pitches would help to strengthen the overall quality of the education that can be provided at Haresfoot Campus and the Berkhamsted School Group.
- Paragraph 15.21 specifically advises that “opportunities for sport and recreation will be supported”.
- Policy CS23 states that social infrastructure “will be encouraged” and that “the provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt”. There is a need for such facilities and the proposal would have minimal impact on the Green Belt.

Local Support

- Unlike other highly contentious proposals that are put forward for the release of Green Belt land for housing on the edge of Berkhamsted, this project is likely to receive a good degree of local support, due to the enhancement in sports facilities that would ensue and the further investment in education and wider community benefits that will flow. Put simply, The School will reinvest into local infrastructure unlike other commercial landowners.
- The significant positive economic and community impact that the School has in the area is recognised by the Oxford Economics Report dated 2014, further details of which are provided within the School Justification Document.
- Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School’s plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and traffic movements
- A key component and driver of the School’s plan is the relocation of Haslam Fields sports provision to Haresfoot.

Sport England Support

- Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: ‘A Sporting Future for the Playing Fields of England’ and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision

and their positive response carries significant weight.

Timing

- In addition to making representations into the single local plan review process, at the appropriate time, planning applications would need to be submitted on both Haslams Field and the receptor site adjoining Haresfoot Campus. The new sports facilities would then be laid out prior to the housing site being redeveloped.
- From the School's perspective there is an urgent, immediate need for the relocation to occur and for the capital receipt to be generated to release funds for vital sports and wider education projects. In light of this and the urgent need for housing sites, we consider the site should be allocated for development through the single Local Plan Review process with no delay to the timing of release.

Conclusion

- In conclusion, for the reasons stated above, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan with the existing playing pitch provision relocated to the Haresfoot Campus.
- The Haslam Fields site is in an accessible and sustainable location on the edge of Berkhamsted and borders existing and allocated development on three sides. The site is directly adjacent to an existing housing allocation at Hanburys, which was brought forward as a local allocation in the Core Strategy due to its sustainable location (the proposed site at Haslam Fields has the same level of sustainability).
- The site is supported in all independent technical reports and in particular in the Phase 2 Green Belt Review is the only site at Berkhamsted categorised as "weakest".
- The proposal includes the relocation of the existing playing pitches to a site adjacent to Haresfoot Campus, which will result in a significant enhancement of provision and is fully acceptable in planning policy terms.
- It is considered that Haslams Fields is the most suitable site in Berkhamsted to be released from the Green Belt and its development would provide much needed housing to contribute towards DBC's overall housing need.
- Vindication of this is provided by the fact that the original version of the draft Issues and Options consultation produced by DBC officers for Cabinet consideration proposed that Haslam Fields was a "suggested option" as a housing allocation.
- It is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required and the School's land

	<p>at Haslam Fields is recognised as the most suitable option at Berkhamsted.</p> <ul style="list-style-type: none"> • If Haslam Fields were allocated for housing development there is an opportunity for further planning gain, with consideration being given to the rear land being safeguarded for some form of public open space, wildlife site/nature reserve/walking field and/or nature reserve if appropriate. • If DBC or the local plan inspector ultimately determines that all of the School's land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise. • Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School's plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and movements. • A key component and driver of the School's plan is the relocation of Haslam Fields sports provision to Haresfoot. As a consequence of all the above we consider that a Green Belt release at Haslam Fields is appropriate and should be supported.
Include files	Kevin Rolfe Images Appendicies and Haslam Fields full Planning Justification document.pdf
Number	Question 46
ID	LPIO22597
Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	
Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>On behalf of The Berkhamsted Schools Group, we support the proposed allocation of the Haslam Fields site (Site Ref Be-H2). The Planning Justification Document submitted in support of the proposed allocation sets out the detailed planning case for the release of Haslam Fields from the Green Belt and its allocation and development for housing together with the relocation of the existing sports provision to an enhanced facility adjoining the Haresfoot Campus.</p> <p>The allocation of Haslam Fields is considered to be acceptable in planning terms, for the reasons summarised below:-</p>

The Council has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should plan for a minimum of 756 dpa. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers Dacorum Council will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate green belt releases. We consider that the Schools land at Haslam Fields is the most suitable future housing allocation from the green belt in Berkhamsted.

House prices in the Dacorum Council area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to provide up to 40 well designed affordable homes, for which there is a local need.

The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication of the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

It is evident that Dacorum Borough Council will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five green belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome. It is clear from the phase 2 green belt study that the Schools land in this area is the most suitable of any green belt releases in Berkhamsted.

The field to the rear is also owned by the Berkhamsted Schools Group and slopes down towards the A41. It is approximately 2.7 hectares in area and currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space with potential for a wildlife site/nature reserve/walking field if appropriate.

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to the Berkhamsted Pre-Prep School at the Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway, and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the green belt. Paragraph 89 of the NPPF confirms that the

provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

The TGMS Equivalent Quality Assessment report & The School's justification report submitted in support of the proposal allocation, demonstrate the problems with the existing Haslam site, and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The additional funds that would flow from this project would be used to enhance sporting facilities not only at the Haresfoot Campus but throughout the Berkhamsted Schools Group estate and will also result in wider educational and community benefits.

Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot. The pre-app response confirms that Sport England would support the principle of the proposal which would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

EXECUTIVE SUMMARY

This Planning Justification Document has been prepared by Aitchison Raffety on behalf of the Berkhamsted Schools Group. It sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing, together with the relocation of the existing sports provision to an enhanced facility adjoining Haresfoot Campus.

The Proposals

The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway which has an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph).

Dacorum Borough Council (DBC) considers that the Haslam Fields site has an indicative capacity of 80-100 dwellings (21-26 dwellings per hectare), which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area.

The land is approximately 3.79 hectares in area and used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that it owns across the town. The field to the rear, also owned by the Berkhamsted Schools Group slopes down towards the A41. It is approximately 2.7 hectares in area and is currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof.

The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus. The Haresfoot land is approximately 5.88 hectares in area and comprises of a large field in agricultural use. Once the new sports provision has been laid out at Haresfoot and ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for the development of much needed housing.

The land at Haresfoot offers the opportunity to provide enhanced sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and also the wider community.

Significant contribution to Housing Land Supply

DBC has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that DBC should plan for a minimum of 756 dpa. However, DBC also needs to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers DBC will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate Green Belt releases. We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted.

Would help address the shortage of affordable homes

House prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to include up to 40 well designed affordable homes, for which there is a local need.

The school has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element at Haslam Fields.

Berkhamsted is an appropriate location for housing

We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in DBC, to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises

that market towns, such as Berkhamsted “have an important role in meeting housing needs”. Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council’s general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted “have an important role in meeting housing needs”. Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication as to the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

Site in a Sustainable Location

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

Appropriate Green Belt Release

It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five Green Belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome. It is clear from the phase 2 green belt study that the School’s

land in this area is the most suitable of any Green Belt releases in Berkhamsted.

Technical aspects

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

Relocated and Enhanced Sports Provision

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

Pre-application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre-App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Other reports from a specialist sports consultant TGMS and from The School, that we have included in support of the proposed allocation, also demonstrate the problems with the existing Haslam site and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The funds that would flow from this project would be used to enhance sporting and education facilities throughout the Berkhamsted Schools Group estate and be of wider community benefit.

Overall Recommendation

For the reasons set out in this Planning Justification Document and the supporting reports and in our separate detailed response to the current Issues & Options consultation, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan, with the existing playing pitch provision relocated to the Haresfoot Campus.

Introduction

- This document has been prepared by Aitchison Raffety, on behalf of the Berkhamsted Schools Group.
- The report relates to two land holdings, both owned by Berkhamsted Schools Group, located close to each other in Berkhamsted. The two areas are; land known as Haslam Fields (and land to the rear), Shootersway, Berkhamsted and secondly land adjacent to the Haresfoot Campus.
- This report sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing. To facilitate the development of the land for housing, it is proposed that the existing playing pitches be relocated to a site adjacent to the Haresfoot Campus. A plan summarising the proposal is provided below:
- This Planning Justification Document should be read in conjunction with the following reports, which provide additional information in support of the proposals; Equivalent Quality Assessment report (three stages) by TGMS Ltd, Sports Surface Consultants, dated 31st October 2015 (Revision 5, 23rd October 2017) Appendix 2 and a Justification Report by The Berkhamsted Schools Group dated October 2017, Appendix 3
- The aforementioned TGMS equivalent quality assessment report has been carried out in accordance with Sport England's Briefing Note 'Equivalent Quality Assessment of Natural Turf Pitches, August 2015.
- The School has also had commissioned various technical reports by consultants including transport, ecology and trees. All the reports confirm that there are no technical constraints to this proposed housing allocation.
- The School will be submitting specific detailed representations to DBC's emerging single local plan via the public consultation process starting with this Issues & Options consultation entitled "Shaping Growth in Dacorum".

The Proposals

Haslam Fields – Proposed Housing allocation

- The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It adjoins existing residential development on Shootersway to the North East and on Denny's Lane to the North West. The site is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway, Berkhamsted, which is a fully allocated site, not in the Green Belt and with an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph)
- In terms of topography, the site of the proposed housing allocation is generally flat. The field to the rear also owned by the Berkhamsted Schools Group slopes down towards the A41. There are no trees within the main core of the site although the Northern and Western boundaries benefit from wooded screens which limit views into the site from Shootersway and Denny's Lane.
- Vehicular access is currently provided via a crossover from Shootersway in the North-West corner of the site.
- The Haslam Fields land comprises approximately 3.79 hectares and is used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that they own across the town. It accommodates sports pitches and an athletics track, but has a number of serious inadequacies, which are set out in detail in the accompanying reports.
- This proposal seeks to allocate the Haslam Fields site for housing in the emerging single local plan. The site is in a sustainable location for housing, and is entirely suitable for residential development.
- The site has an indicative capacity of up to 80-100 dwellings, 21-26 dwellings per hectare, which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area. A plan of the Haslam Fields proposed housing allocation is provided below
- Further land owned by the School immediately to the rear of Haslam Fields is approximately 2.7 hectares and is currently in agricultural use. This land offers a good opportunity for biodiversity improvements such as public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof. Further details on this aspect of the proposal are covered later in this report and a plan is provided below
- Some of the DBC Issues & Options consultation documents refer to the potential linkage of this rear section of land as part of a larger possible housing allocation, together with the front Haslam Fields and other land not owned by the School enclosed by the A41 bypass and the A416. If the final decision of the Council or an Inspector is that the School's rear land should also form part of a larger housing allocation then the School would also

support that possibility, but on the basis that it should not prejudice the prospects or delay the early release of Haslam Fields, which is a deliverable short term stand-alone proposition which would bring many benefits.

- ***Haresfoot Campus – Replacement Sports Provision.***
- The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus.
- The Haresfoot land in question is approximately 5.88 hectares in area and comprises of a large field in agricultural use, which is located to the South of Chesham Road, West of White Hill, and to the North East of the existing driveway to the school.
- The land is within the ownership of the Berkhamsted Schools
- Once the new sports provision has been laid out at Haresfoot and is ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for development of much needed housing.
- The new sports pitches at Haresfoot would be located within a larger area than the existing facility at Haslam Fields and are able to accommodate substantially more sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and therefore to the wider community.
- Indicative summer and winter layouts (2 alternative options) are attached at Appendix 1. Please note that these are indicative proposals at this stage to establish the principle of the overall proposal, detailed aspects are expected to be addressed during the subsequent planning applications phase.
- We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted. The detailed reasons for this are set out within this report.
- DBC has confirmed that the School's land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. As such, the site has the potential to make a significant contribution to the Council's housing land supply, in a sustainable location that is appropriate for housing growth. The National Planning Policy Framework places great weight on the need to provide sufficient housing. It focuses on the need to increase housing supply and makes it absolutely clear that we must house a rising population, which is living longer and who want to make new choices. Paragraph 47 states that local planning authorities should "boost significantly the supply of housing" and the proposal would provide a form of housing for which there is a clear need. The provision of sufficient "market" housing is a necessary

component in meeting the social role of sustainable development, as defined at paragraph 7 of the NPPF.

Would help address the shortage of affordable homes

- It is acknowledged by all parties that house prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The proposed site offers an opportunity to provide well designed affordable housing for local people.
- Policy CS19 of the Dacorum Core Strategy sets a target of 35% of all new dwellings. The site has an indicative capacity of 80 to 100 dwellings in total, and at 35% provision would equate to 28 to 35 new affordable homes.
- It is acknowledged that some previous Green Belt releases have been allocated on the basis of 40% affordable housing provision. Based on the sites indicative capacity of 80-100 dwellings in total, 40% provision would equate to 32 to 40 new affordable homes. Any proposed development at Haslam Fields will be policy compliant in respect of affordable housing.
- The latest Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum. The analysis has been based on meeting affordable housing need over the 23-year period from 2013 to 2036.
- The table below shows the gross affordable housing completions that have been recorded in each of the past 5 years, giving an average of 164 affordable dwellings per annum. It demonstrates that past delivery has consistently been significantly below the identified need for affordable housing. Even if the Council achieves 35% affordable housing in respect of every new development over the plan period, there will still be a very significant shortfall of affordable housing in Dacorum.

YEAR

COMPLETIONS

AFFORDABLE HOUSING

NEED

SHORTFALL

2015/16

203

366

-163

2014/15

254

366

-112

2013/14

123
 366
 -243
 2012/13
 92
 366
 -274
 2011/12
 149
 366
 -217
 5 year average annual rate of provision
 164
 366
 -202

- Having regard to the above, it is considered that the provision of affordable housing, as part of the allocation and development of the site, should be afforded substantial weight in support of the proposal.
- To this end The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.
- It is also worth noting that the School experiences big issues recruiting staff due to high local house prices and part of any allocation at Haslam Fields could potentially be utilised for the provision of an element of staff accommodation which would be a benefit to sustainability.

Berkhamsted is an appropriate location for housing

- We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in Dacorum, to take an appropriate share of future housing growth.
- The allocation of this site for housing would reflect the Council’s general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted “have an important role in meeting housing needs”.
- This approach is supported by Policy CS1 of the Core Strategy which relates to the distribution of development, and states that “The market towns and large villages will accommodate new development for housing... of a scale commensurate with the size of the settlement and the range of local services and facilities”. Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.
- In the original draft version of the Issues and Options consultation document submitted to

Cabinet, DBC considered three options for the dispersal of housing numbers. These were; to concentrate growth at Hemel Hempstead only; spread growth across the three largest settlements of Hemel, Berkhamsted & Tring or to spread growth across the three towns and the larger villages.

- The conclusion was that the “suggested option” for consultation purposes was the option to spread growth across the Borough including the towns and larger villages. The School would support that approach or alternatively an approach that includes growth at just the three largest towns including Berkhamsted. Berkhamsted is the second largest town and should take an appropriate share of growth and the benefits that can be derived from that.
- In the first draft consultation document the DBC officers rejected the proposition of growth only being applied to Hemel Hempstead and we strongly agree with DBC
- In the revised final version of the draft Issues and Options consultation document DBC is not stating any suggested option as to how to disperse growth. However it does state that the current settlement hierarchy in the adopted core strategy should remain and we strongly support this approach.
- We propose that DBC should reinstate its previous suggested approach as to how any final housing numbers should be spread or that any final option must include Berkhamsted as the second largest town.
- For its part, the Berkhamsted Schools Group has capacity and a desire to contribute to accommodating the additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

- The whole site (both elements) was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The Green Belt location was noted, but the site was formally accepted on the basis that it was suitable for development, subject to the findings of the Green Belt review being prepared in respect of the emerging Single Local Plan. The SHLAA notes that the playing field use would need to be relocated, and this forms part of the current proposal.
- The SHLAA assessment provides a very useful indication of the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight. The extract from the SHLAA is report is below

Site in a Sustainable Location

- During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference

to other options. The site at Hanburys was designated for housing due to its sustainable location.

- As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.
- It is clear that the ultimate outcome of future testing of the Haslam Fields land will be the same as with the Hanburys site and it will, therefore, score very favourably compared to other proposals on the edge of Berkhamsted. The plan below shows the proximity of the site to existing and allocated residential development, which demonstrates its sustainable location.
- The proposed Haslam site allocation is in an accessible location, on the edge of the existing built up area of Berkhamsted. The site is within easy reach of local shops and services, and the High Street is only 0.7 miles away, and can be reached by foot in 13 minutes and by cycle in only 3 minutes. All of the following can be easily accessed by foot or cycle
 - Mainline Railway Station;
 - High Street shops, cafes and restaurants; .
 - Three supermarkets (Tesco, M&S, Waitrose);
 - Sports facilities including a Leisure Centre;
 - Library, cinema, schools
- In the independent sustainability appraisal produced by consultants TRL, which accompanies the Issues & Options consultation document the site scores favourably overall compared to other green belt sites. We disagree with Table 1 of the Schedule of Site Appraisals where it states that the Haslam Fields site is not in a sustainable location. This is plainly wrong as the site is in an accessible location, within the existing built up area of Berkhamsted. As shown above it is within easy reach of local shops and services, and the High Street. It is considered that the site is a natural location for the expansion of Berkhamsted. We note that other sites have mistakenly been scored highly in respect of their location, even though they are no closer to the town centre.

Appropriate Green Belt Release

- It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted.
- The phase 1 Green Belt Study produced in 2013 identified a swathe of Green Belt land within which the Haslam Fields site is identified as site GB11. The relevant extract is below which confirms that the subject site is within a parcel that contributes least to the five Green Belt purposes:
- The phase 2 Green Belt study then focussed upon these least important areas and looked at smaller specific areas contained within.

- The Phase 2 Green Belt study was produced by independent consultants and was published in December 2016. The study tested sites across all relevant criteria and concluded by ranking them, in order of least importance to the green belt performance from “Weakest”, “Weakly”, “Moderately” and “Strongly”.
- The entire extent of the School’s land at Haslam Fields and to the rear was adjudged to be “weakest” defined as scoring weakly across all purposes. See Extract below:-
- It is important to note that the School’s land is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome.
- Within the Phase 2 study the School’s land has been assessed as part of a larger section of land, named area D-S2a, see plan below.
- The accompanying text associated with area D-S2a confirms that “...the A41 to the south and A416 to the east would provide the most logical southernmost extent for the built-up area of Berkhamsted and defensible new boundaries for the Green Belt”.
- The phase 2 study also states that this “does not compromise the ability of the wider green belt to meet its purposes, nor is it judged to be highly sensitive to changes in landscape terms A number of possible new Green Belt boundaries have been identified, which could be taken into account in future assessment work”.
- It is clear from the phase 2 green belt study that the School’s land in this area is the most suitable of any green belt releases in Berkhamsted.
- Following on from the phase 2 Green Belt study DBC have undertaken the further assessment work recommended. This has included obtaining independent sustainability reports from consultants TRL and holding meetings with those parties such as ourselves that represent appropriate landowners to check upon availability and planning gain possibilities.
- The above work culminated in DBC producing the first draft of the Issues and Options consultation document for the Cabinet meeting on 19 September.
- As would have been expected due to the findings of all the above technical work, in this original proposed version of the consultation document the School’s land at Haslam Fields was identified as a “suggested option”, site Be-h2 for a potential housing allocation, for consultation purposes, see extract below.

BERKHAMSTED

Be-h2

Haslam Fields, Shootersway*

Key: *= Housing sites included within the “Suggested Option”.

- It is very important to be clear that Haslam Fields is totally capable of being allocated as a separate smaller stand-alone allocation as put forward in the original version of the consultation document and with biodiversity enhancement at the rear.
- If however DBC or the local plan inspector ultimately determines that all the School's land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise.
- As stated previously, the original draft version of the Issues and Options document was not progressed due to the release of the government's consultation which has an impact upon future housing numbers and has created further uncertainty.
- Due to this uncertainty the revised and published version of the Issues & Options consultation document no longer includes any reference to "suggested options" and instead consultation is taking place on all possible sites that have been put forward by landowners, regardless of the DBC opinion about their suitability. We do not agree with this approach as clearly from DBC's own assessment and the views of their independent consultants some sites are considered more suitable than others and should be stated as such.
- The individual site assessments are still included within the independent consultants Sustainability Appraisal documents which form part of the public consultation process and the content remains the same. The suitability of the School land compared to other Green Belt sites remains clear from this document and from the previous version of the Issues & Options consultation draft produced by DBC officers.
- The Council have also released as part of the final consultation documents, a Schedule of Site Appraisals on all potential large greenfield sites. These pro-formas are based upon meetings held with DBC officers and upon the findings of the independent consultants and upon DBC officer opinion. The School's land is described as site Be-h2, Haslam Fields, Shootersway, pages 39-43.
- In conclusion, it is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required. The School's land at Haslam Fields is recognised as the most suitable option at Berkhamsted.

Technical aspects

- There are no technical constraints that would restrict the development of Haslam Fields.
- The School has obtained a Transport Statement (TS) prepared by SK Transport Planning Limited

dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. The modelling work in the TS confirms that the recently upgraded signalised junction at Kingshill

Way/Shootersway will have some spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented,

- The position of the new access has been designed in a central location to the current frontage which achieves safety requirements. A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective
- An ecological assessment was undertaken by Arbtech in July 2016. The Haslam Fields part of the site was assessed to hold negligible ecological value. The rear parcel of land could be used for biodiversity enhancement.
- Copies of these reports are also submitted to Dacorum Council

Opportunity for provision of Public Open Space and an Increase in Biodiversity

- Subject to discussions with DBC, the allocation and development of the Haslam Fields site for housing also offers the opportunity for a substantial area of new public open space of some form to be provided on the Schools land to the rear. The rear element is some 2.76 hectares in area and offers the potential for a nature reserve area, wildlife, walking field, open space or a combination to be provided if appropriate, which would result in a significant gain in biodiversity.
- The provision of public open space and measures to improve biodiversity could be secured through a planning condition, which would be effective in safeguarding the rear of the site from future development. The provision of these planning benefits is considered to provide weight in favour of the proposed allocation.
- The provision of public open space and measures to enhance biodiversity are matters that we would wish to discuss with DBC in further detail.
- Alternatively, if it is subsequently concluded by DBC or an Inspector that this rear land should also form part of a larger housing allocation including the front land and other landholdings, then the school would wish to discuss the appropriate uses of all or part of the rear land. Some opportunity for more limited biodiversity measures should still exist.

Relocated and Enhanced Sports Provision

- It is recognised that planning policy seeks to resist the loss of sports facilities. This is reflected in the relevant technical and consultation documents which state that the front part of Haslam Fields is suitable for housing development, subject to the relocation of the playing fields. To facilitate the development of the land for housing, it is therefore

proposed that the existing playing pitches be relocated to a site adjacent to Haresfoot Campus. As there will no loss of provision, the policy requirement is met.

- The proposed site at Haresfoot Campus is some 5.88 hectares in area, which is more than double the size of the existing pitches only at Haslam Fields (2.78 hectares).
- The sale proceeds from the Haslam Fields housing land would be used to directly fund the construction of the new sports facilities and also to provide the necessary funds for ongoing maintenance.
- The existing facilities are predominantly used by the prep school with some limited ancillary use by Berkhamsted Raiders Football Club as a small part of their wider provision. The new relocated and enhanced facilities would still allow potential opportunities for links with local community groups and other schools to be explored when appropriate.
- The additional funds that would flow from this project would be used to enhance sporting facilities, not only at the Haresfoot Campus, but throughout the Berkhamsted Schools Group estate.
- The School is in the process of reviewing its future education needs and formulating a strategic property plan to look at specific opportunities across the campuses, to strengthen education provision as a whole. The Haslams/Haresfoot relocation is already established as a priority. The funds that flow from this project will play a vital part in ensuring that these longer-term needs can be met and will result in wide community benefits.
- The other reports referred to below, submitted in support of the proposed allocation, demonstrate the problems with the existing Haslam site and show the enhanced quality of sports provision that can be provided at the Haresfoot Campus.

Justification report produced by Berkhamsted School

- The detailed justification report produced by Berkhamsted School sets out the extent and nature of the current usage at Haslam Fields; identifies the problems encountered; assesses future needs and sets out the benefits of the project from a sport and education provision perspective. The key conclusions of which are as follows:
- The existing facilities at Haslam Fields are unable to support increasing demand for sport at the school and the sporting programmes they wish to implement. There is no scope for expansion at Haslam Fields so as a direct result students are missing opportunities to participate in sport across all ability
- The pitches are in constant use which in turn means that they are rarely rotated and unable to recover easily from excessive wear and surface
- The number of fixtures available will increase by 93% leading to an increase in participation frequency of 114%.

- The use of the pitches in the current location also has an impact upon local residents from car parking and traffic congestion on the local highway.
- The proposals not only replace the existing junior sports facilities at Haslam Fields but also provide the option for some additional pitch/match provision for older age groups as overflow to the Chesham Road playing fields which are heavily congested and prone to cancellation due to over use.

TGMS Ltd Report

- The TGMS Report provides an assessment of the quality of the sports pitches at the existing site. The clear conclusion, which is also clear from the School's direct experience, is that there are many practical issues with the existing facilities which impact upon effective usage. It makes clear that only half of the pitches comply with Sport England guidance.
- The report analyses the existing site and compares the current sports provision at Haslam Fields to the proposed replacement facilities at Haresfoot Campus, having regard to Sports England guidelines. The report concludes that there are many benefits achieved from the relocation.
- The full TGMS report is submitted for your information, but the executive summary provides a useful table (inserted below) which summarises the key improvements in provision. It shows that when assessed against Sports England guidelines, the proposed site represents a substantial improvement on the existing in the majority of areas, and is equivalent to the existing in the remaining areas. Sports England have been consulted and accept the reports contents (see later comment).

Relocation acceptable in Planning Terms

- It is clear from the above assessment that the School has the opportunity to provide significant improvements to its sports facilities by developing the new facilities at Haresfoot Campus. The land area available for sport will be doubled and the quality of facilities will go well beyond those currently at Haslam Fields.
- A move to Haresfoot Campus allows the potential to develop first class sports facilities for the School and this will in turn therefore benefit the local community.
- As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.
- The change also allows scope for visiting teams and parents to utilise the existing facilities at Haresfoot Campus for after match refreshments, as opposed to the current arduous practice of having to travel to another campus within the town

after matches, with the impact and added congestion that entails.

- The level of facilities required can be accommodated fully at Haresfoot Campus and preliminary layouts are provided at Appendix 1. It should be noted that the majority of the proposal is for open grass pitches. There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. There is a small-scale pavilion which can be sensitively designed and appropriate areas for car parking.

Acceptable impact in Openness of Green Belt

- The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt.
- Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development within the Green Belt, subject to preserving openness. The provision of playing pitches will have no impact at all on openness.
- The proposed use is considered to be acceptable having regard to policy CS5 of the Core Strategy which relates to development within the Green Belt. It states that the Council will apply national Green Belt policy to protect the openness and character of the Green Belt, and that small scale development will be permitted for buildings defined as appropriate in national policy.
- The pavilion building would be located sympathetically, close to the existing buildings beyond the southern boundary of Haresfoot Campus. This would ensure built development remains concentrated to one area, maintaining the openness of the site as a whole. In addition, it would ensure that the pavilion is seen in context with the neighbouring buildings.
- In terms of design, the building would be constructed of natural materials and could be designed to have a barn like appearance (i.e. timber clad). This would give the building a rural appearance in- keeping with its Green Belt location.
- No obtrusive fencing would be erected on the site boundaries and no artificial lighting is proposed. Furthermore, no 3G pitches are proposed. During the summer months the sports track would simply be marked out on the grass, and the cricket nets would not incorporate an artificial surface.

Amenity of Residents

- The proposed sports use would not have an adverse impact upon the amenities of the occupiers of nearby properties.
- The immediate vicinity only contains a very small number of residential properties. Three dwellings are located adjacent to Chesham Road to the North West and one on While Hill to the North East. Given the expansive nature of the site, sports use

would not harm the amenity of surrounding occupiers. Existing trees and landscaping will be maintained and also enhanced where appropriate. The final detailed layout for the sports pitches and ancillary facilities will be determined at subsequent planning application stage but the initial plans have been designed with a view to minimising any possible limited impact.

- No artificial lighting is proposed and therefore the proposed use would not harm the amenities of neighbours due to excessive light. The lack of floodlights will prevent sports uses taking place late in the evening.
- The site is sustainably located close to the A41 junction for Chesham and Berkhamsted. It is therefore in a highly accessible location where the existing road infrastructure is already capable of supporting the number of traffic movements associated with the sports pitches. In highway terms this is an improvement upon the situation at Haslam Fields which is problematical.

Planning policy support for improved sports provision at schools

- There is a clear link between outdoor sport and health and the Government seeks to encourage people to lead more active and healthier lives.
- Supports the provision of facilities for education and outdoor sport and the Government's objective to secure such facilities is a material factor in support of the proposed allocation.
- Paragraph 70 of the NPPF seeks to deliver a variety of social and recreational facilities and services and states that planning policies and decisions should "plan positively" for their provision and use.
- Paragraph 73 also advises that access to opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Paragraph 162 provides advice on the provision of infrastructure, which includes facilities for education.
- Paragraph 171 provides advice on the provision of facilities for health and well-being. It states that local planning authorities should understand and take account of the health status and needs of the local population, with specific reference to the provision of facilities for sport and recreation. The proposed development meets this objective.
- It is clear that National and local planning policies and guidance support the provision of facilities for outdoor sport and education, as summarised below:
 - **National Planning Policy Framework**
 - Our proposal results in a significant increase in participation being possible in sports and exercise, further details of which are contained within the School justification document.

Dacorum Borough Council Core Strategy

- Recognises the contribution of the education sector to the provision of jobs within Dacorum. The improved sports pitches are part of a number of measures that would assist the School in attracting and retaining pupils and this would safeguard the range of employment opportunities which exist at the Berkhamsted School Group
- Paragraph 15.1 of the Core Strategy states that the well-being of Dacorum's communities depends on having the appropriate 'social infrastructure'. Figure 14 confirms that social infrastructure includes education facilities and also facilities for outdoor leisure and sport.
- Paragraph 15.11 of the core strategy recognises that the private sector has a strong presence in the borough and "plays an important role in providing independent school places". The improved sports pitches would help to strengthen the overall quality of the education that can be provided at Haresfoot Campus and the Berkhamsted School Group.
- Paragraph 15.21 specifically advises that "opportunities for sport and recreation will be supported".
- Policy CS23 states that social infrastructure "will be encouraged" and that "the provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt". There is a need for such facilities and the proposal would have minimal impact on the Green Belt.

Local Support

- Unlike other highly contentious proposals that are put forward for the release of Green Belt land for housing on the edge of Berkhamsted, this project is likely to receive a good degree of local support, due to the enhancement in sports facilities that would ensue and the further investment in education and wider community benefits that will flow. Put simply, The School will reinvest into local infrastructure unlike other commercial landowners.
- The significant positive economic and community impact that the School has in the area is recognised by the Oxford Economics Report dated 2014, further details of which are provided within the School Justification Document.
- Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School's plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and traffic movements
- A key component and driver of the School's plan is the relocation of Haslam Fields sports provision to Haresfoot.

Sport England Support

- Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Timing

- In addition to making representations into the single local plan review process, at the appropriate time, planning applications would need to be submitted on both Haslams Field and the receptor site adjoining Haresfoot Campus. The new sports facilities would then be laid out prior to the housing site being redeveloped.
- From the School's perspective there is an urgent, immediate need for the relocation to occur and for the capital receipt to be generated to release funds for vital sports and wider education projects. In light of this and the urgent need for housing sites, we consider the site should be allocated for development through the single Local Plan Review process with no delay to the timing of release.

Conclusion

- In conclusion, for the reasons stated above, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan with the existing playing pitch provision relocated to the Haresfoot Campus.
- The Haslam Fields site is in an accessible and sustainable location on the edge of Berkhamsted and borders existing and allocated development on three sides. The site is directly adjacent to an existing housing allocation at Hanburys, which was brought forward as a local allocation in the Core Strategy due to its sustainable location (the proposed site at Haslam Fields has the same level of sustainability).
- The site is supported in all independent technical reports and in particular in the Phase 2 Green Belt Review is the only site at Berkhamsted categorised as "weakest".
- The proposal includes the relocation of the existing playing pitches to a site adjacent to Haresfoot Campus, which will result in a significant enhancement of provision and is fully acceptable in planning policy terms.
- It is considered that Haslams Fields is the most suitable site in Berkhamsted to be released from the Green Belt and its development would provide much needed housing to contribute towards DBC's overall housing need.

	<ul style="list-style-type: none"> • Vindication of this is provided by the fact that the original version of the draft Issues and Options consultation produced by DBC officers for Cabinet consideration proposed that Haslam Fields was a “suggested option” as a housing allocation. • It is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required and the School’s land at Haslam Fields is recognised as the most suitable option at Berkhamsted. • If Haslam Fields were allocated for housing development there is an opportunity for further planning gain, with consideration being given to the rear land being safeguarded for some form of public open space, wildlife site/nature reserve/walking field and/or nature reserve if appropriate. • If DBC or the local plan inspector ultimately determines that all of the School’s land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise. • Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School’s plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and movements. • A key component and driver of the School’s plan is the relocation of Haslam Fields sports provision to Haresfoot. As a consequence of all the above we consider that a Green Belt release at Haslam Fields is appropriate and should be supported.
Include files	Kevin Rolfe - Images Appendicies and Transport Statement.pdf
Number	Question 46
ID	LPIO22598
Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	
Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

On behalf of The Berkhamsted Schools Group, we support the proposed allocation of the Haslam Fields site (Site Ref Be-H2). The Planning Justification Document submitted in support of the proposed allocation sets out the detailed planning case for the release of Haslam Fields from the Green Belt and its allocation and development for housing together with the relocation of the existing sports provision to an enhanced facility adjoining the Haresfoot Campus.

The allocation of Haslam Fields is considered to be acceptable in planning terms, for the reasons summarised below:-

The Council has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should plan for a minimum of 756 dpa. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers Dacorum Council will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate green belt releases. We consider that the Schools land at Haslam Fields is the most suitable future housing allocation from the green belt in Berkhamsted.

House prices in the Dacorum Council area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to provide up to 40 well designed affordable homes, for which there is a local need.

The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication of the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were

assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

It is evident that Dacorum Borough Council will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five green belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the "Weakest" category outcome. It is clear from the phase 2 green belt study that the Schools land in this area is the most suitable of any green belt releases in Berkhamsted.

The field to the rear is also owned by the Berkhamsted Schools Group and slopes down towards the A41. It is approximately 2.7 hectares in area and currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space with potential for a wildlife site/nature reserve/walking field if appropriate.

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to the Berkhamsted Pre-Prep School at the Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway, and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the green belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

The TGMS Equivalent Quality Assessment report & The School's justification report submitted in support of the proposal allocation, demonstrate the problems with the existing Haslam site, and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The additional funds that would flow from this project would be used to enhance sporting facilities not only at the Haresfoot Campus but throughout the Berkhamsted Schools Group estate and will also result in wider educational and community benefits.

Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot. The pre-app response confirms that Sport England would support the principle of the proposal which would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

EXECUTIVE SUMMARY

This Planning Justification Document has been prepared by Aitchison Raffety on behalf of the Berkhamsted Schools Group. It sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing, together with the relocation of the existing sports provision to an enhanced facility adjoining Haresfoot Campus.

The Proposals

The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway which has an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph).

Dacorum Borough Council (DBC) considers that the Haslam Fields site has an indicative capacity of 80-100 dwellings (21-26 dwellings per hectare), which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area.

The land is approximately 3.79 hectares in area and used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that it owns across the town. The field to the rear, also owned by the Berkhamsted Schools Group slopes down towards the A41. It is approximately 2.7 hectares in area and is currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof.

The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus. The Haresfoot land is approximately 5.88 hectares in area and comprises of a large field in agricultural use. Once the new sports provision has been laid out at Haresfoot and ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for the development of much needed housing.

The land at Haresfoot offers the opportunity to provide enhanced sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and also the wider community.

Significant contribution to Housing Land Supply

DBC has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that DBC should plan for a minimum of 756 dpa. However, DBC also needs to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers DBC will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate Green Belt releases. We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted.

Would help address the shortage of affordable homes

House prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to include up to 40 well designed affordable homes, for which there is a local need.

The school has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element at Haslam Fields.

Berkhamsted is an appropriate location for housing

We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in DBC, to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication as to the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

Site in a Sustainable Location

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

Appropriate Green Belt Release

It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five Green Belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome. It is clear from the phase 2 green belt study that the School’s land in this area is the most suitable of any Green Belt releases in Berkhamsted.

Technical aspects

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

Relocated and Enhanced Sports Provision

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

Pre-application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their

replacement with enhanced sports provision at Haresfoot (Sport England Pre-App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Other reports from a specialist sports consultant TGMS and from The School, that we have included in support of the proposed allocation, also demonstrate the problems with the existing Haslam site and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The funds that would flow from this project would be used to enhance sporting and education facilities throughout the Berkhamsted Schools Group estate and be of wider community benefit.

Overall Recommendation

For the reasons set out in this Planning Justification Document and the supporting reports and in our separate detailed response to the current Issues & Options consultation, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan, with the existing playing pitch provision relocated to the Haresfoot Campus.

Introduction

- This document has been prepared by Aitchison Raffety, on behalf of the Berkhamsted Schools Group.
- The report relates to two land holdings, both owned by Berkhamsted Schools Group, located close to each other in Berkhamsted. The two areas are; land known as Haslam Fields (and land to the rear), Shootersway, Berkhamsted and secondly land adjacent to the Haresfoot Campus.
- This report sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing. To facilitate the development of the land for housing, it is proposed that the existing playing pitches be relocated to a site adjacent to the Haresfoot Campus. A plan summarising the proposal is provided below:
- This Planning Justification Document should be read in conjunction with the following reports, which provide additional information in support of the proposals; Equivalent Quality Assessment report (three stages) by TGMS Ltd, Sports Surface Consultants, dated 31st October 2015 (Revision 5, 23rd October 2017) Appendix 2 and a Justification Report by The Berkhamsted Schools Group dated October 2017, Appendix 3
- The aforementioned TGMS equivalent quality assessment report has been carried out in accordance with Sport England's Briefing Note 'Equivalent Quality Assessment of Natural Turf Pitches, August 2015.

- The School has also had commissioned various technical reports by consultants including transport, ecology and trees. All the reports confirm that there are no technical constraints to this proposed housing allocation.
- The School will be submitting specific detailed representations to DBC's emerging single local plan via the public consultation process starting with this Issues & Options consultation entitled "Shaping Growth in Dacorum".

The Proposals

Haslam Fields – Proposed Housing allocation

- The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It adjoins existing residential development on Shootersway to the North East and on Denny's Lane to the North West. The site is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway, Berkhamsted, which is a fully allocated site, not in the Green Belt and with an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph)
- In terms of topography, the site of the proposed housing allocation is generally flat. The field to the rear also owned by the Berkhamsted Schools Group slopes down towards the A41. There are no trees within the main core of the site although the Northern and Western boundaries benefit from wooded screens which limit views into the site from Shootersway and Denny's Lane.
- Vehicular access is currently provided via a crossover from Shootersway in the North-West corner of the site.
- The Haslam Fields land comprises approximately 3.79 hectares and is used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that they own across the town. It accommodates sports pitches and an athletics track, but has a number of serious inadequacies, which are set out in detail in the accompanying reports.
- This proposal seeks to allocate the Haslam Fields site for housing in the emerging single local plan. The site is in a sustainable location for housing, and is entirely suitable for residential development.
- The site has an indicative capacity of up to 80-100 dwellings, 21-26 dwellings per hectare, which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area. A plan of the Haslam Fields proposed housing allocation is provided below
- Further land owned by the School immediately to the rear of Haslam Fields is approximately 2.7 hectares and is currently in agricultural use. This land offers a good opportunity for biodiversity improvements such as public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof. Further details on this

aspect of the proposal are covered later in this report and a plan is provided below

- Some of the DBC Issues & Options consultation documents refer to the potential linkage of this rear section of land as part of a larger possible housing allocation, together with the front Haslam Fields and other land not owned by the School enclosed by the A41 bypass and the A416. If the final decision of the Council or an Inspector is that the School's rear land should also form part of a larger housing allocation then the School would also support that possibility, but on the basis that it should not prejudice the prospects or delay the early release of Haslam Fields, which is a deliverable short term stand-alone proposition which would bring many benefits.

- ***Haresfoot Campus – Replacement Sports Provision.***

- The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus.
- The Haresfoot land in question is approximately 5.88 hectares in area and comprises of a large field in agricultural use, which is located to the South of Chesham Road, West of White Hill, and to the North East of the existing driveway to the school.
- The land is within the ownership of the Berkhamsted Schools
- Once the new sports provision has been laid out at Haresfoot and is ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for development of much needed housing.
- The new sports pitches at Haresfoot would be located within a larger area than the existing facility at Haslam Fields and are able to accommodate substantially more sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and therefore to the wider community.
- Indicative summer and winter layouts (2 alternative options) are attached at Appendix 1. Please note that these are indicative proposals at this stage to establish the principle of the overall proposal, detailed aspects are expected to be addressed during the subsequent planning applications phase.
- We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted. The detailed reasons for this are set out within this report.
- DBC has confirmed that the School's land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. As such, the site has the potential to make a significant contribution to the Council's housing land supply, in a sustainable location that is appropriate for

housing growth. The National Planning Policy Framework places great weight on the need to provide sufficient housing. It focuses on the need to increase housing supply and makes it absolutely clear that we must house a rising population, which is living longer and who want to make new choices. Paragraph 47 states that local planning authorities should “boost significantly the supply of housing” and the proposal would provide a form of housing for which there is a clear need. The provision of sufficient “market” housing is a necessary component in meeting the social role of sustainable development, as defined at paragraph 7 of the NPPF.

Would help address the shortage of affordable homes

- It is acknowledged by all parties that house prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The proposed site offers an opportunity to provide well designed affordable housing for local people.
- Policy CS19 of the Dacorum Core Strategy sets a target of 35% of all new dwellings. The site has an indicative capacity of 80 to 100 dwellings in total, and at 35% provision would equate to 28 to 35 new affordable homes.
- It is acknowledged that some previous Green Belt releases have been allocated on the basis of 40% affordable housing provision. Based on the sites indicative capacity of 80-100 dwellings in total, 40% provision would equate to 32 to 40 new affordable homes. Any proposed development at Haslam Fields will be policy compliant in respect of affordable housing.
- The latest Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum. The analysis has been based on meeting affordable housing need over the 23-year period from 2013 to 2036.
- The table below shows the gross affordable housing completions that have been recorded in each of the past 5 years, giving an average of 164 affordable dwellings per annum. It demonstrates that past delivery has consistently been significantly below the identified need for affordable housing. Even if the Council achieves 35% affordable housing in respect of every new development over the plan period, there will still be a very significant shortfall of affordable housing in Dacorum.

YEAR

COMPLETIONS

AFFORDABLE HOUSING

NEED

SHORTFALL

2015/16

203
 366
 -163
 2014/15
 254
 366
 -112
 2013/14
 123
 366
 -243
 2012/13
 92
 366
 -274
 2011/12
 149
 366
 -217
 5 year average annual rate of provision
 164
 366
 -202

- Having regard to the above, it is considered that the provision of affordable housing, as part of the allocation and development of the site, should be afforded substantial weight in support of the proposal.
- To this end The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.
- It is also worth noting that the School experiences big issues recruiting staff due to high local house prices and part of any allocation at Haslam Fields could potentially be utilised for the provision of an element of staff accommodation which would be a benefit to sustainability.

Berkhamsted is an appropriate location for housing

- We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in Dacorum, to take an appropriate share of future housing growth.
- The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs".
- This approach is supported by Policy CS1 of the Core Strategy which relates to the distribution of

development, and states that “The market towns and large villages will accommodate new development for housing... of a scale commensurate with the size of the settlement and the range of local services and facilities”.

Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

- In the original draft version of the Issues and Options consultation document submitted to Cabinet, DBC considered three options for the dispersal of housing numbers. These were; to concentrate growth at Hemel Hempstead only; spread growth across the three largest settlements of Hemel, Berkhamsted & Tring or to spread growth across the three towns and the larger villages.
- The conclusion was that the “suggested option” for consultation purposes was the option to spread growth across the Borough including the towns and larger villages. The School would support that approach or alternatively an approach that includes growth at just the three largest towns including Berkhamsted. Berkhamsted is the second largest town and should take an appropriate share of growth and the benefits that can be derived from that.
- In the first draft consultation document the DBC officers rejected the proposition of growth only being applied to Hemel Hempstead and we strongly agree with DBC
- In the revised final version of the draft Issues and Options consultation document DBC is not stating any suggested option as to how to disperse growth. However it does state that the current settlement hierarchy in the adopted core strategy should remain and we strongly support this approach.
- We propose that DBC should reinstate its previous suggested approach as to how any final housing numbers should be spread or that any final option must include Berkhamsted as the second largest town.
- For its part, the Berkhamsted Schools Group has capacity and a desire to contribute to accommodating the additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

- The whole site (both elements) was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The Green Belt location was noted, but the site was formally accepted on the basis that it was suitable for development, subject to the findings of the Green Belt review being prepared in respect of the emerging Single Local Plan. The SHLAA notes that the playing field use would need to be relocated, and this forms part of the current proposal.
- The SHLAA assessment provides a very useful indication of the ability of a particular site to

accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight. The extract from the SHLAA is report is below

Site in a Sustainable Location

- During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. The site at Hanburys was designated for housing due to its sustainable location.
- As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.
- It is clear that the ultimate outcome of future testing of the Haslam Fields land will be the same as with the Hanburys site and it will, therefore, score very favourably compared to other proposals on the edge of Berkhamsted. The plan below shows the proximity of the site to existing and allocated residential development, which demonstrates its sustainable location.
- The proposed Haslam site allocation is in an accessible location, on the edge of the existing built up area of Berkhamsted. The site is within easy reach of local shops and services, and the High Street is only 0.7 miles away, and can be reached by foot in 13 minutes and by cycle in only 3 minutes. All of the following can be easily accessed by foot or cycle
 - Mainline Railway Station;
 - High Street shops, cafes and restaurants; .
 - Three supermarkets (Tesco, M&S, Waitrose);
 - Sports facilities including a Leisure Centre;
 - Library, cinema, schools
- In the independent sustainability appraisal produced by consultants TRL, which accompanies the Issues & Options consultation document the site scores favourably overall compared to other green belt sites. We disagree with Table 1 of the Schedule of Site Appraisals where it states that the Haslam Fields site is not in a sustainable location. This is plainly wrong as the site is in an accessible location, within the existing built up area of Berkhamsted. As shown above it is within easy reach of local shops and services, and the High Street. It is considered that the site is a natural location for the expansion of Berkhamsted. We note that other sites have mistakenly been scored highly in respect of their location, even though they are no closer to the town centre.

Appropriate Green Belt Release

- It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted.

- The phase 1 Green Belt Study produced in 2013 identified a swathe of Green Belt land within which the Haslam Fields site is identified as site GB11. The relevant extract is below which confirms that the subject site is within a parcel that contributes least to the five Green Belt purposes:
- The phase 2 Green Belt study then focussed upon these least important areas and looked at smaller specific areas contained within.
- The Phase 2 Green Belt study was produced by independent consultants and was published in December 2016. The study tested sites across all relevant criteria and concluded by ranking them, in order of least importance to the green belt performance from “Weakest”, “Weakly”, “Moderately” and “Strongly”.
- The entire extent of the School’s land at Haslam Fields and to the rear was adjudged to be “weakest” defined as scoring weakly across all purposes. See Extract below:-
- It is important to note that the School’s land is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome.
- Within the Phase 2 study the School’s land has been assessed as part of a larger section of land, named area D-S2a, see plan below.
- The accompanying text associated with area D-S2a confirms that “...the A41 to the south and A416 to the east would provide the most logical southernmost extent for the built-up area of Berkhamsted and defensible new boundaries for the Green Belt”.
- The phase 2 study also states that this “does not compromise the ability of the wider green belt to meet its purposes, nor is it judged to be highly sensitive to changes in landscape terms A number of possible new Green Belt boundaries have been identified, which could be taken into account in future assessment work”.
- It is clear from the phase 2 green belt study that the School’s land in this area is the most suitable of any green belt releases in Berkhamsted.
- Following on from the phase 2 Green Belt study DBC have undertaken the further assessment work recommended. This has included obtaining independent sustainability reports from consultants TRL and holding meetings with those parties such as ourselves that represent appropriate landowners to check upon availability and planning gain possibilities.
- The above work culminated in DBC producing the first draft of the Issues and Options consultation document for the Cabinet meeting on 19 September.
- As would have been expected due to the findings of all the above technical work, in this original proposed version of the consultation document the School’s land at Haslam Fields was identified as a “suggested option”, site Be-h2 for a potential housing allocation, for consultation purposes, see extract below.

BERKHAMSTED

Be-h2

Haslam Fields, Shootersway*

Key: *= Housing sites included within the "Suggested Option".

- It is very important to be clear that Haslam Fields is totally capable of being allocated as a separate smaller stand-alone allocation as put forward in the original version of the consultation document and with biodiversity enhancement at the rear.
- If however DBC or the local plan inspector ultimately determines that all the School's land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise.
- As stated previously, the original draft version of the Issues and Options document was not progressed due to the release of the government's consultation which has an impact upon future housing numbers and has created further uncertainty.
- Due to this uncertainty the revised and published version of the Issues & Options consultation document no longer includes any reference to "suggested options" and instead consultation is taking place on all possible sites that have been put forward by landowners, regardless of the DBC opinion about their suitability. We do not agree with this approach as clearly from DBC's own assessment and the views of their independent consultants some sites are considered more suitable than others and should be stated as such.
- The individual site assessments are still included within the independent consultants Sustainability Appraisal documents which form part of the public consultation process and the content remains the same. The suitability of the School land compared to other Green Belt sites remains clear from this document and from the previous version of the Issues & Options consultation draft produced by DBC officers.
- The Council have also released as part of the final consultation documents, a Schedule of Site Appraisals on all potential large greenfield sites. These pro-formas are based upon meetings held with DBC officers and upon the findings of the independent consultants and upon DBC officer opinion. The School's land is described as site Be-h2, Haslam Fields, Shootersway, pages 39-43.
- In conclusion, it is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required. The School's

land at Haslam Fields is recognised as the most suitable option at Berkhamsted.

Technical aspects

- There are no technical constraints that would restrict the development of Haslam Fields.
- The School has obtained a Transport Statement (TS) prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. The modelling work in the TS confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will have some spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented,
- The position of the new access has been designed in a central location to the current frontage which achieves safety requirements. A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective
- An ecological assessment was undertaken by Arbtech in July 2016. The Haslam Fields part of the site was assessed to hold negligible ecological value. The rear parcel of land could be used for biodiversity enhancement.
- Copies of these reports are also submitted to Dacorum Council

Opportunity for provision of Public Open Space and an Increase in Biodiversity

- Subject to discussions with DBC, the allocation and development of the Haslam Fields site for housing also offers the opportunity for a substantial area of new public open space of some form to be provided on the Schools land to the rear. The rear element is some 2.76 hectares in area and offers the potential for a nature reserve area, wildlife, walking field, open space or a combination to be provided if appropriate, which would result in a significant gain in biodiversity.
- The provision of public open space and measures to improve biodiversity could be secured through a planning condition, which would be effective in safeguarding the rear of the site from future development. The provision of these planning benefits is considered to provide weight in favour of the proposed allocation.
- The provision of public open space and measures to enhance biodiversity are matters that we would wish to discuss with DBC in further detail.
- Alternatively, if it is subsequently concluded by DBC or an Inspector that this rear land should also form part of a larger housing allocation including the front land and other landholdings, then the school would wish to discuss the appropriate uses of all or part of the rear land. Some opportunity for more limited biodiversity measures should still exist.

Relocated and Enhanced Sports Provision

- It is recognised that planning policy seeks to resist the loss of sports facilities. This is reflected in the relevant technical and consultation documents which state that the front part of Haslam Fields is suitable for housing development, subject to the relocation of the playing fields. To facilitate the development of the land for housing, it is therefore proposed that the existing playing pitches be relocated to a site adjacent to Haresfoot Campus. As there will be no loss of provision, the policy requirement is met.
- The proposed site at Haresfoot Campus is some 5.88 hectares in area, which is more than double the size of the existing pitches only at Haslam Fields (2.78 hectares).
- The sale proceeds from the Haslam Fields housing land would be used to directly fund the construction of the new sports facilities and also to provide the necessary funds for ongoing maintenance.
- The existing facilities are predominantly used by the prep school with some limited ancillary use by Berkhamsted Raiders Football Club as a small part of their wider provision. The new relocated and enhanced facilities would still allow potential opportunities for links with local community groups and other schools to be explored when appropriate.
- The additional funds that would flow from this project would be used to enhance sporting facilities, not only at the Haresfoot Campus, but throughout the Berkhamsted Schools Group estate.
- The School is in the process of reviewing its future education needs and formulating a strategic property plan to look at specific opportunities across the campuses, to strengthen education provision as a whole. The Haslam/Haresfoot relocation is already established as a priority. The funds that flow from this project will play a vital part in ensuring that these longer-term needs can be met and will result in wide community benefits.
- The other reports referred to below, submitted in support of the proposed allocation, demonstrate the problems with the existing Haslam site and show the enhanced quality of sports provision that can be provided at the Haresfoot Campus.

Justification report produced by Berkhamsted School

- The detailed justification report produced by Berkhamsted School sets out the extent and nature of the current usage at Haslam Fields; identifies the problems encountered; assesses future needs and sets out the benefits of the project from a sport and education provision perspective. The key conclusions of which are as follows:
- The existing facilities at Haslam Fields are unable to support increasing demand for sport at the school and the sporting programmes they wish to implement. There is no scope for expansion at

Haslam Fields so as a direct result students are missing opportunities to participate in sport across all ability

- The pitches are in constant use which in turn means that they are rarely rotated and unable to recover easily from excessive wear and surface
- The number of fixtures available will increase by 93% leading to an increase in participation frequency of 114%.
- The use of the pitches in the current location also has an impact upon local residents from car parking and traffic congestion on the local highway.
- The proposals not only replace the existing junior sports facilities at Haslam Fields but also provide the option for some additional pitch/match provision for older age groups as overflow to the Chesham Road playing fields which are heavily congested and prone to cancellation due to over use.

TGMS Ltd Report

- The TGMS Report provides an assessment of the quality of the sports pitches at the existing site. The clear conclusion, which is also clear from the School's direct experience, is that there are many practical issues with the existing facilities which impact upon effective usage. It makes clear that only half of the pitches comply with Sport England guidance.
- The report analyses the existing site and compares the current sports provision at Haslam Fields to the proposed replacement facilities at Haresfoot Campus, having regard to Sports England guidelines. The report concludes that there are many benefits achieved from the relocation.
- The full TGMS report is submitted for your information, but the executive summary provides a useful table (inserted below) which summarises the key improvements in provision. It shows that when assessed against Sports England guidelines, the proposed site represents a substantial improvement on the existing in the majority of areas, and is equivalent to the existing in the remaining areas. Sports England have been consulted and accept the reports contents (see later comment).

Relocation acceptable in Planning Terms

- It is clear from the above assessment that the School has the opportunity to provide significant improvements to its sports facilities by developing the new facilities at Haresfoot Campus. The land area available for sport will be doubled and the quality of facilities will go well beyond those currently at Haslam Fields.
- A move to Haresfoot Campus allows the potential to develop first class sports facilities for the School and this will in turn therefore benefit the local community.
- As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and

coach travel will be taken away from the local highway and into a much more self-contained environment.

- The change also allows scope for visiting teams and parents to utilise the existing facilities at Haresfoot Campus for after match refreshments, as opposed to the current arduous practice of having to travel to another campus within the town after matches, with the impact and added congestion that entails.
- The level of facilities required can be accommodated fully at Haresfoot Campus and preliminary layouts are provided at Appendix 1. It should be noted that the majority of the proposal is for open grass pitches. There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. There is a small-scale pavilion which can be sensitively designed and appropriate areas for car parking.

Acceptable impact in Openness of Green Belt

- The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt.
- Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development within the Green Belt, subject to preserving openness. The provision of playing pitches will have no impact at all on openness.
- The proposed use is considered to be acceptable having regard to policy CS5 of the Core Strategy which relates to development within the Green Belt. It states that the Council will apply national Green Belt policy to protect the openness and character of the Green Belt, and that small scale development will be permitted for buildings defined as appropriate in national policy.
- The pavilion building would be located sympathetically, close to the existing buildings beyond the southern boundary of Haresfoot Campus. This would ensure built development remains concentrated to one area, maintaining the openness of the site as a whole. In addition, it would ensure that the pavilion is seen in context with the neighbouring buildings.
- In terms of design, the building would be constructed of natural materials and could be designed to have a barn like appearance (i.e. timber clad). This would give the building a rural appearance in- keeping with its Green Belt location.
- No obtrusive fencing would be erected on the site boundaries and no artificial lighting is proposed. Furthermore, no 3G pitches are proposed. During the summer months the sports track would simply be marked out on the grass, and the cricket nets would not incorporate an artificial surface.

Amenity of Residents

- The proposed sports use would not have an adverse impact upon the amenities of the occupiers of nearby properties.
- The immediate vicinity only contains a very small number of residential properties. Three dwellings are located adjacent to Chesham Road to the North West and one on While Hill to the North East. Given the expansive nature of the site, sports use would not harm the amenity of surrounding occupiers. Existing trees and landscaping will be maintained and also enhanced where appropriate. The final detailed layout for the sports pitches and ancillary facilities will be determined at subsequent planning application stage but the initial plans have been designed with a view to minimising any possible limited impact.
- No artificial lighting is proposed and therefore the proposed use would not harm the amenities of neighbours due to excessive light. The lack of floodlights will prevent sports uses taking place late in the evening.
- The site is sustainably located close to the A41 junction for Chesham and Berkhamsted. It is therefore in a highly accessible location where the existing road infrastructure is already capable of supporting the number of traffic movements associated with the sports pitches. In highway terms this is an improvement upon the situation at Haslam Fields which is problematical.

Planning policy support for improved sports provision at schools

- There is a clear link between outdoor sport and health and the Government seeks to encourage people to lead more active and healthier lives.
- Supports the provision of facilities for education and outdoor sport and the Government's objective to secure such facilities is a material factor in support of the proposed allocation.
- Paragraph 70 of the NPPF seeks to deliver a variety of social and recreational facilities and services and states that planning policies and decisions should "plan positively" for their provision and use.
- Paragraph 73 also advises that access to opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Paragraph 162 provides advice on the provision of infrastructure, which includes facilities for education.
- Paragraph 171 provides advice on the provision of facilities for health and well-being. It states that local planning authorities should understand and take account of the health status and needs of the local population, with specific reference to the provision of facilities for sport and recreation. The proposed development meets this objective.
- It is clear that National and local planning policies and guidance support the provision of facilities for

outdoor sport and education, as summarised below:

- **National Planning Policy Framework**
- Our proposal results in a significant increase in participation being possible in sports and exercise, further details of which are contained within the School justification document.

Dacorum Borough Council Core Strategy

- Recognises the contribution of the education sector to the provision of jobs within Dacorum. The improved sports pitches are part of a number of measures that would assist the School in attracting and retaining pupils and this would safeguard the range of employment opportunities which exist at the Berkhamsted School Group
- Paragraph 15.1 of the Core Strategy states that the well-being of Dacorum's communities depends on having the appropriate 'social infrastructure'. Figure 14 confirms that social infrastructure includes education facilities and also facilities for outdoor leisure and sport.
- Paragraph 15.11 of the core strategy recognises that the private sector has a strong presence in the borough and "plays an important role in providing independent school places". The improved sports pitches would help to strengthen the overall quality of the education that can be provided at Haresfoot Campus and the Berkhamsted School Group.
- Paragraph 15.21 specifically advises that "opportunities for sport and recreation will be supported".
- Policy CS23 states that social infrastructure "will be encouraged" and that "the provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt". There is a need for such facilities and the proposal would have minimal impact on the Green Belt.

Local Support

- Unlike other highly contentious proposals that are put forward for the release of Green Belt land for housing on the edge of Berkhamsted, this project is likely to receive a good degree of local support, due to the enhancement in sports facilities that would ensue and the further investment in education and wider community benefits that will flow. Put simply, The School will reinvest into local infrastructure unlike other commercial landowners.
- The significant positive economic and community impact that the School has in the area is recognised by the Oxford Economics Report dated 2014, further details of which are provided within the School Justification Document.
- Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School's plan will not only help to accommodate future growth but will over

time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and traffic movements

- A key component and driver of the School's plan is the relocation of Haslam Fields sports provision to Haresfoot.

Sport England Support

- Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Timing

- In addition to making representations into the single local plan review process, at the appropriate time, planning applications would need to be submitted on both Haslams Field and the receptor site adjoining Haresfoot Campus. The new sports facilities would then be laid out prior to the housing site being redeveloped.
- From the School's perspective there is an urgent, immediate need for the relocation to occur and for the capital receipt to be generated to release funds for vital sports and wider education projects. In light of this and the urgent need for housing sites, we consider the site should be allocated for development through the single Local Plan Review process with no delay to the timing of release.

Conclusion

- In conclusion, for the reasons stated above, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan with the existing playing pitch provision relocated to the Haresfoot Campus.
- The Haslam Fields site is in an accessible and sustainable location on the edge of Berkhamsted and borders existing and allocated development on three sides. The site is directly adjacent to an existing housing allocation at Hanburys, which was brought forward as a local allocation in the Core Strategy due to its sustainable location (the proposed site at Haslam Fields has the same level of sustainability).
- The site is supported in all independent technical reports and in particular in the Phase 2 Green Belt Review is the only site at Berkhamsted categorised as "weakest".
- The proposal includes the relocation of the existing playing pitches to a site adjacent to Haresfoot

	<p>Campus, which will result in a significant enhancement of provision and is fully acceptable in planning policy terms.</p> <ul style="list-style-type: none"> • It is considered that Haslams Fields is the most suitable site in Berkhamsted to be released from the Green Belt and its development would provide much needed housing to contribute towards DBC's overall housing need. • Vindication of this is provided by the fact that the original version of the draft Issues and Options consultation produced by DBC officers for Cabinet consideration proposed that Haslam Fields was a "suggested option" as a housing allocation. • It is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required and the School's land at Haslam Fields is recognised as the most suitable option at Berkhamsted. • If Haslam Fields were allocated for housing development there is an opportunity for further planning gain, with consideration being given to the rear land being safeguarded for some form of public open space, wildlife site/nature reserve/walking field and/or nature reserve if appropriate. • If DBC or the local plan inspector ultimately determines that all of the School's land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise. • Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School's plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and movements. • A key component and driver of the School's plan is the relocation of Haslam Fields sports provision to Haresfoot. As a consequence of all the above we consider that a Green Belt release at Haslam Fields is appropriate and should be supported.
Include files	Kevin Rolfe Images Appendicies and Ecological Assessment.pdf
Number	Question 46
ID	LPIO22599
Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	

Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>On behalf of The Berkhamsted Schools Group, we support the proposed allocation of the Haslam Fields site (Site Ref Be-H2). The Planning Justification Document submitted in support of the proposed allocation sets out the detailed planning case for the release of Haslam Fields from the Green Belt and its allocation and development for housing together with the relocation of the existing sports provision to an enhanced facility adjoining the Haresfoot Campus.</p> <p>The allocation of Haslam Fields is considered to be acceptable in planning terms, for the reasons summarised below:-</p> <p>The Council has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.</p> <p>It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that the council should plan for a minimum of 756 dpa. However, the Council also need to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.</p> <p>Whilst it is uncertain what final level of housing numbers Dacorum Council will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate green belt releases. We consider that the Schools land at Haslam Fields is the most suitable future housing allocation from the green belt in Berkhamsted.</p> <p>House prices in the Dacorum Council area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to provide up to 40 well designed affordable homes, for which there is a local need.</p> <p>The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.</p> <p>The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication of the</p>

ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

It is evident that Dacorum Borough Council will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five green belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the "Weakest" category outcome. It is clear from the phase 2 green belt study that the Schools land in this area is the most suitable of any green belt releases in Berkhamsted.

The field to the rear is also owned by the Berkhamsted Schools Group and slopes down towards the A41. It is approximately 2.7 hectares in area and currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space with potential for a wildlife site/nature reserve/walking field if appropriate.

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to the Berkhamsted Pre-Prep School at the Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway, and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the green belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

The TGMS Equivalent Quality Assessment report & The School's justification report submitted in support of the proposal allocation, demonstrate the problems with the existing Haslam site, and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The additional funds that would flow from this project would be used to enhance sporting facilities not only at the Haresfoot Campus but throughout the Berkhamsted Schools Group estate and will also result in wider educational and community benefits.

Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot. The pre-app response confirms that Sport England would support the principle of the proposal which would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

EXECUTIVE SUMMARY

This Planning Justification Document has been prepared by Aitchison Raffety on behalf of the Berkhamsted Schools Group. It sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing, together with the relocation of the existing sports provision to an enhanced facility adjoining Haresfoot Campus.

The Proposals

The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It is directly adjacent to Local Allocation 'LA4' known as Land at and

to the rear of Hanburys and The Old Orchard, Shootersway which has an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph).

Dacorum Borough Council (DBC) considers that the Haslam Fields site has an indicative capacity of 80-100 dwellings (21-26 dwellings per hectare), which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area.

The land is approximately 3.79 hectares in area and used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that it owns across the town. The field to the rear, also owned by the Berkhamsted Schools Group slopes down towards the A41. It is approximately 2.7 hectares in area and is currently in agricultural use. It offers an opportunity for the provision of biodiversity improvements and the provision of public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof.

The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus. The Haresfoot land is approximately 5.88 hectares in area and comprises of a large field in agricultural use. Once the new sports provision has been laid out at Haresfoot and ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for the development of much needed housing.

The land at Haresfoot offers the opportunity to provide enhanced sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and also the wider community.

Significant contribution to Housing Land Supply

DBC has confirmed that the Schools land at Haslam Fields could deliver between 80 and 100 dwellings in total. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. The site has the potential to make a significant contribution to the council's housing land supply, in a sustainable location that is appropriate for housing growth.

It is considered that the SHMA (Feb 2016) represents the most up to date current assessment of housing need and that DBC should plan for a minimum of 756 dpa. However, DBC also needs to ensure that it has sufficient sites to meet the new proposed method for calculating housing numbers, which could become formal policy by Spring 2018, one year before the date that the new Local Plan is due to be adopted.

Whilst it is uncertain what final level of housing numbers DBC will need to accommodate, what is not in doubt is that significant growth is required and appropriate. Regardless of the final housing number it will necessitate Green Belt releases. We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted.

Would help address the shortage of affordable homes

House prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum per year, but past delivery has consistently been significantly below this at only 164 homes. The proposed site offers an opportunity to include up to 40 well designed affordable homes, for which there is a local need.

The school has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element at Haslam Fields.

Berkhamsted is an appropriate location for housing

We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in DBC, to take an appropriate share of future housing growth. The allocation of this site for housing would reflect the Council's general hierarchal approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.

The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

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The Berkhamsted Schools Group has a desire to contribute to accommodating additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

The site was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The SHLAA assessment provides a very useful indication as to the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight.

Site in a Sustainable Location

During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.

The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services, and the High Street is can be reached by foot in 13 minutes and by cycle in only 3 minutes. It is considered that the site is a natural location for the expansion of Berkhamsted.

Appropriate Green Belt Release

It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted. The phase 1 Green Belt Study produced in 2013 confirms that the Haslam Fields site is part of a swath of land that contributes least to the five Green Belt purposes.

The phase 2 Green Belt study confirms that the Haslam site is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome. It is clear from the phase 2 green belt study that the School’s land in this area is the most suitable of any Green Belt releases in Berkhamsted.

Technical aspects

There are no technical constraints that would restrict the development of Haslam Fields. The School has obtained a Transport Statement prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. It confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will continue to have spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented.

A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective. An ecological assessment was undertaken by Arbtech in July 2016 which confirms that the Haslam Fields part of the site has negligible ecological value and the rear parcel of land could be used for biodiversity enhancement.

Relocated and Enhanced Sports Provision

To facilitate the development of the land for housing, the existing playing pitches will be relocated to a site adjacent to Haresfoot Campus. The proposed site at Haresfoot Campus is larger than Haslam Fields, and the move to Haresfoot Campus allows the potential to develop first class sports facilities for the school and this will in turn therefore benefit the local community.

As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.

There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. A small-scale pavilion is proposed, but this would be sensitively designed. The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the

Green Belt. Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development. The provision of playing pitches will have no impact at all on openness.

Pre-application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre-App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Other reports from a specialist sports consultant TGMS and from The School, that we have included in support of the proposed allocation, also demonstrate the problems with the existing Haslam site and outline the benefits of the enhanced quality of sports provision that can be provided at Haresfoot Campus.

The funds that would flow from this project would be used to enhance sporting and education facilities throughout the Berkhamsted Schools Group estate and be of wider community benefit.

Overall Recommendation

For the reasons set out in this Planning Justification Document and the supporting reports and in our separate detailed response to the current Issues & Options consultation, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan, with the existing playing pitch provision relocated to the Haresfoot Campus.

Introduction

- This document has been prepared by Aitchison Raffety, on behalf of the Berkhamsted Schools Group.
- The report relates to two land holdings, both owned by Berkhamsted Schools Group, located close to each other in Berkhamsted. The two areas are; land known as Haslam Fields (and land to the rear), Shootersway, Berkhamsted and secondly land adjacent to the Haresfoot Campus.
- This report sets out the planning case in support of the release of Haslam Fields from the Green Belt and its allocation and development for housing. To facilitate the development of the land for housing, it is proposed that the existing playing pitches be relocated to a site adjacent to the Haresfoot Campus. A plan summarising the proposal is provided below:
- This Planning Justification Document should be read in conjunction with the following reports, which provide additional information in support of the proposals; Equivalent Quality Assessment report (three stages) by TGMS Ltd, Sports Surface Consultants, dated 31st October 2015 (Revision 5, 23rd October 2017) Appendix 2 and a

Justification Report by The Berkhamsted Schools Group dated October 2017, Appendix 3

- The aforementioned TGMS equivalent quality assessment report has been carried out in accordance with Sport England's Briefing Note 'Equivalent Quality Assessment of Natural Turf Pitches, August 2015.
- The School has also had commissioned various technical reports by consultants including transport, ecology and trees. All the reports confirm that there are no technical constraints to this proposed housing allocation.
- The School will be submitting specific detailed representations to DBC's emerging single local plan via the public consultation process starting with this Issues & Options consultation entitled "Shaping Growth in Dacorum".

The Proposals

Haslam Fields – Proposed Housing allocation

- The Haslam Fields site is in a sustainable location on the edge of the built-up area of Berkhamsted. It adjoins existing residential development on Shootersway to the North East and on Denny's Lane to the North West. The site is directly adjacent to Local Allocation 'LA4' known as Land at and to the rear of Hanburys and The Old Orchard, Shootersway, Berkhamsted, which is a fully allocated site, not in the Green Belt and with an adopted development brief for in the region of 40 dwellings (1.9 hectares, 21 dph)
- In terms of topography, the site of the proposed housing allocation is generally flat. The field to the rear also owned by the Berkhamsted Schools Group slopes down towards the A41. There are no trees within the main core of the site although the Northern and Western boundaries benefit from wooded screens which limit views into the site from Shootersway and Denny's Lane.
- Vehicular access is currently provided via a crossover from Shootersway in the North-West corner of the site.
- The Haslam Fields land comprises approximately 3.79 hectares and is used by Berkhamsted School (Prep School mainly) as one of a number of sports facilities that they own across the town. It accommodates sports pitches and an athletics track, but has a number of serious inadequacies, which are set out in detail in the accompanying reports.
- This proposal seeks to allocate the Haslam Fields site for housing in the emerging single local plan. The site is in a sustainable location for housing, and is entirely suitable for residential development.
- The site has an indicative capacity of up to 80-100 dwellings, 21-26 dwellings per hectare, which relates well to the relatively low density of the existing adjoining housing allocation and the character of the local area. A plan of the Haslam Fields proposed housing allocation is provided below

- Further land owned by the School immediately to the rear of Haslam Fields is approximately 2.7 hectares and is currently in agricultural use. This land offers a good opportunity for biodiversity improvements such as public open space of some form; a nature reserve/wildlife area/walking field or a combination thereof. Further details on this aspect of the proposal are covered later in this report and a plan is provided below
- Some of the DBC Issues & Options consultation documents refer to the potential linkage of this rear section of land as part of a larger possible housing allocation, together with the front Haslam Fields and other land not owned by the School enclosed by the A41 bypass and the A416. If the final decision of the Council or an Inspector is that the School's rear land should also form part of a larger housing allocation then the School would also support that possibility, but on the basis that it should not prejudice the prospects or delay the early release of Haslam Fields, which is a deliverable short term stand-alone proposition which would bring many benefits.
- ***Haresfoot Campus – Replacement Sports Provision.***
 - The proposal is to relocate the existing sports facilities used by Berkhamsted School, from Haslam Fields onto land adjacent to the Haresfoot Campus.
 - The Haresfoot land in question is approximately 5.88 hectares in area and comprises of a large field in agricultural use, which is located to the South of Chesham Road, West of White Hill, and to the North East of the existing driveway to the school.
 - The land is within the ownership of the Berkhamsted Schools
 - Once the new sports provision has been laid out at Haresfoot and is ready for use, the proposal is for the front section of the Haslam Fields land to then be readily available for development of much needed housing.
 - The new sports pitches at Haresfoot would be located within a larger area than the existing facility at Haslam Fields and are able to accommodate substantially more sports provision, providing a benefit to Berkhamsted School pupils, parents and visitors and therefore to the wider community.
 - Indicative summer and winter layouts (2 alternative options) are attached at Appendix 1. Please note that these are indicative proposals at this stage to establish the principle of the overall proposal, detailed aspects are expected to be addressed during the subsequent planning applications phase.
 - We consider that the School's land at Haslam Fields is the most suitable future housing allocation from the Green Belt in Berkhamsted. The detailed reasons for this are set out within this report.
 - DBC has confirmed that the School's land at Haslam Fields could deliver between 80 and 100

dwellings in total, depending on the density of development. This is based on the development of the site at either 21 or 26 dwellings per hectare, both of which are relatively modest. As such, the site has the potential to make a significant contribution to the Council's housing land supply, in a sustainable location that is appropriate for housing growth. The National Planning Policy Framework places great weight on the need to provide sufficient housing. It focuses on the need to increase housing supply and makes it absolutely clear that we must house a rising population, which is living longer and who want to make new choices. Paragraph 47 states that local planning authorities should "boost significantly the supply of housing" and the proposal would provide a form of housing for which there is a clear need. The provision of sufficient "market" housing is a necessary component in meeting the social role of sustainable development, as defined at paragraph 7 of the NPPF.

Would help address the shortage of affordable homes

- It is acknowledged by all parties that house prices in the DBC area and Berkhamsted in particular have become increasingly unaffordable to local people. The proposed site offers an opportunity to provide well designed affordable housing for local people.
- Policy CS19 of the Dacorum Core Strategy sets a target of 35% of all new dwellings. The site has an indicative capacity of 80 to 100 dwellings in total, and at 35% provision would equate to 28 to 35 new affordable homes.
- It is acknowledged that some previous Green Belt releases have been allocated on the basis of 40% affordable housing provision. Based on the sites indicative capacity of 80-100 dwellings in total, 40% provision would equate to 32 to 40 new affordable homes. Any proposed development at Haslam Fields will be policy compliant in respect of affordable housing.
- The latest Housing Market Needs Assessment (2016) identifies an overall net annual need of 366 affordable homes in Dacorum. The analysis has been based on meeting affordable housing need over the 23-year period from 2013 to 2036.
- The table below shows the gross affordable housing completions that have been recorded in each of the past 5 years, giving an average of 164 affordable dwellings per annum. It demonstrates that past delivery has consistently been significantly below the identified need for affordable housing. Even if the Council achieves 35% affordable housing in respect of every new development over the plan period, there will still be a very significant shortfall of affordable housing in Dacorum.

**YEAR
COMPLETIONS
AFFORDABLE HOUSING
NEED
SHORTFALL**

2015/16

203

366

-163

2014/15

254

366

-112

2013/14

123

366

-243

2012/13

92

366

-274

2011/12

149

366

-217

5 year average annual rate of provision

164

366

-202

- Having regard to the above, it is considered that the provision of affordable housing, as part of the allocation and development of the site, should be afforded substantial weight in support of the proposal.
- To this end The School has had initial discussions with Hightown Housing Association as a possible delivery partner for the affordable housing element.
- It is also worth noting that the School experiences big issues recruiting staff due to high local house prices and part of any allocation at Haslam Fields could potentially be utilised for the provision of an element of staff accommodation which would be a benefit to sustainability.

Berkhamsted is an appropriate location for housing

- We recognise that the expansion of Hemel Hempstead is a focus for growth, but it is also important for Berkhamsted, as the second largest town in Dacorum, to take an appropriate share of future housing growth.

- The allocation of this site for housing would reflect the Council's general hierarchical approach to development, as set out in Table 1 of the Core Strategy. This advises that market towns, such as Berkhamsted "have an important role in meeting housing needs".
- This approach is supported by Policy CS1 of the Core Strategy which relates to the distribution of development, and states that "The market towns and large villages will accommodate new development for housing... of a scale commensurate with the size of the settlement and the range of local services and facilities". Berkhamsted has a very good range of local services and facilities, and is a sustainable location for future housing growth of the scale proposed.
- In the original draft version of the Issues and Options consultation document submitted to Cabinet, DBC considered three options for the dispersal of housing numbers. These were; to concentrate growth at Hemel Hempstead only; spread growth across the three largest settlements of Hemel, Berkhamsted & Tring or to spread growth across the three towns and the larger villages.
- The conclusion was that the "suggested option" for consultation purposes was the option to spread growth across the Borough including the towns and larger villages. The School would support that approach or alternatively an approach that includes growth at just the three largest towns including Berkhamsted. Berkhamsted is the second largest town and should take an appropriate share of growth and the benefits that can be derived from that.
- In the first draft consultation document the DBC officers rejected the proposition of growth only being applied to Hemel Hempstead and we strongly agree with DBC
- In the revised final version of the draft Issues and Options consultation document DBC is not stating any suggested option as to how to disperse growth. However it does state that the current settlement hierarchy in the adopted core strategy should remain and we strongly support this approach.
- We propose that DBC should reinstate its previous suggested approach as to how any final housing numbers should be spread or that any final option must include Berkhamsted as the second largest town.
- For its part, the Berkhamsted Schools Group has capacity and a desire to contribute to accommodating the additional education demand that would arise from future housing growth in the area as a whole.

Supported by SHLAA

- The whole site (both elements) was assessed in the SHLAA published in February 2016 (site BW2), and was identified as suitable for development, available, and achievable. The Green Belt location was noted, but the site was formally accepted on

the basis that it was suitable for development, subject to the findings of the Green Belt review being prepared in respect of the emerging Single Local Plan. The SHLAA notes that the playing field use would need to be relocated, and this forms part of the current proposal.

- The SHLAA assessment provides a very useful indication of the ability of a particular site to accommodate development. The conclusions reached in respect of the suitability of the Haslam Fields site for housing, should be given due weight. The extract from the SHLAA is report is below

Site in a Sustainable Location

- During the adoption process for the current Core Strategy, various Green Belt sites in Berkhamsted were assessed, culminating in the release of the Hanburys site as a Local Allocation, in preference to other options. The site at Hanburys was designated for housing due to its sustainable location.
- As the Hanburys site immediately adjoins Haslam Fields, it is considered that both sites are as sustainable as one another.
- It is clear that the ultimate outcome of future testing of the Haslam Fields land will be the same as with the Hanburys site and it will, therefore, score very favourably compared to other proposals on the edge of Berkhamsted. The plan below shows the proximity of the site to existing and allocated residential development, which demonstrates its sustainable location.
- The proposed Haslam site allocation is in an accessible location, on the edge of the existing built up area of Berkhamsted. The site is within easy reach of local shops and services, and the High Street is only 0.7 miles away, and can be reached by foot in 13 minutes and by cycle in only 3 minutes. All of the following can be easily accessed by foot or cycle
 - Mainline Railway Station;
 - High Street shops, cafes and restaurants; .
 - Three supermarkets (Tesco, M&S, Waitrose);
 - Sports facilities including a Leisure Centre;
 - Library, cinema, schools
- In the independent sustainability appraisal produced by consultants TRL, which accompanies the Issues & Options consultation document the site scores favourably overall compared to other green belt sites. We disagree with Table 1 of the Schedule of Site Appraisals where it states that the Haslam Fields site is not in a sustainable location. This is plainly wrong as the site is in an accessible location, within the existing built up area of Berkhamsted. As shown above it is within easy reach of local shops and services, and the High Street. It is considered that the site is a natural location for the expansion of Berkhamsted. We note that other sites have mistakenly been scored

highly in respect of their location, even though they are no closer to the town centre.

Appropriate Green Belt Release

- It is evident that DBC will be required to allocate significant additional land for housing, which will necessitate Green Belt releases. It is entirely appropriate for Green Belt releases to be made in Berkhamsted.
- The phase 1 Green Belt Study produced in 2013 identified a swathe of Green Belt land within which the Haslam Fields site is identified as site GB11. The relevant extract is below which confirms that the subject site is within a parcel that contributes least to the five Green Belt purposes:
- The phase 2 Green Belt study then focussed upon these least important areas and looked at smaller specific areas contained within.
- The Phase 2 Green Belt study was produced by independent consultants and was published in December 2016. The study tested sites across all relevant criteria and concluded by ranking them, in order of least importance to the green belt performance from “Weakest”, “Weakly”, “Moderately” and “Strongly”.
- The entire extent of the School’s land at Haslam Fields and to the rear was adjudged to be “weakest” defined as scoring weakly across all purposes. See Extract below:-
- It is important to note that the School’s land is part of the only area in Berkhamsted that was judged to have the “Weakest” category outcome.
- Within the Phase 2 study the School’s land has been assessed as part of a larger section of land, named area D-S2a, see plan below.
- The accompanying text associated with area D-S2a confirms that “...the A41 to the south and A416 to the east would provide the most logical southernmost extent for the built-up area of Berkhamsted and defensible new boundaries for the Green Belt”.
- The phase 2 study also states that this “does not compromise the ability of the wider green belt to meet its purposes, nor is it judged to be highly sensitive to changes in landscape terms A number of possible new Green Belt boundaries have been identified, which could be taken into account in future assessment work”.
- It is clear from the phase 2 green belt study that the School’s land in this area is the most suitable of any green belt releases in Berkhamsted.
- Following on from the phase 2 Green Belt study DBC have undertaken the further assessment work recommended. This has included obtaining independent sustainability reports from consultants TRL and holding meetings with those parties such as ourselves that represent appropriate landowners to check upon availability and planning gain possibilities.
- The above work culminated in DBC producing the first draft of the Issues and Options consultation

document for the Cabinet meeting on 19 September.

- As would have been expected due to the findings of all the above technical work, in this original proposed version of the consultation document the School's land at Haslam Fields was identified as a "suggested option", site Be-h2 for a potential housing allocation, for consultation purposes, see extract below.

BERKHAMSTED

Be-h2

Haslam Fields, Shootersway*

Key: *= Housing sites included within the "Suggested Option".

- It is very important to be clear that Haslam Fields is totally capable of being allocated as a separate smaller stand-alone allocation as put forward in the original version of the consultation document and with biodiversity enhancement at the rear.
- If however DBC or the local plan inspector ultimately determines that all the School's land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise.
- As stated previously, the original draft version of the Issues and Options document was not progressed due to the release of the government's consultation which has an impact upon future housing numbers and has created further uncertainty.
- Due to this uncertainty the revised and published version of the Issues & Options consultation document no longer includes any reference to "suggested options" and instead consultation is taking place on all possible sites that have been put forward by landowners, regardless of the DBC opinion about their suitability. We do not agree with this approach as clearly from DBC's own assessment and the views of their independent consultants some sites are considered more suitable than others and should be stated as such.
- The individual site assessments are still included within the independent consultants Sustainability Appraisal documents which form part of the public consultation process and the content remains the same. The suitability of the School land compared to other Green Belt sites remains clear from this document and from the previous version of the Issues & Options consultation draft produced by DBC officers.
- The Council have also released as part of the final consultation documents, a Schedule of Site Appraisals on all potential large greenfield sites. These pro-formas are based upon meetings held

with DBC officers and upon the findings of the independent consultants and upon DBC officer opinion. The School's land is described as site Be-h2, Haslam Fields, Shootersway, pages 39-43.

- In conclusion, it is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required. The School's land at Haslam Fields is recognised as the most suitable option at Berkhamsted.

Technical aspects

- There are no technical constraints that would restrict the development of Haslam Fields.
- The School has obtained a Transport Statement (TS) prepared by SK Transport Planning Limited dated October 2017. The report confirms that in traffic and transport terms a 100 unit development at Haslam Fields is appropriate, deliverable and will have no adverse material impact on the surrounding highway network. The modelling work in the TS confirms that the recently upgraded signalised junction at Kingshill Way/Shootersway will have some spare capacity after the development of both the land at Hanburys and at Haslam Fields is implemented,
- The position of the new access has been designed in a central location to the current frontage which achieves safety requirements. A Tree Survey by Patrick Stileman Ltd dated August 2017 recommended the proposed access point as acceptable from an arboricultural perspective
- An ecological assessment was undertaken by Arbtech in July 2016. The Haslam Fields part of the site was assessed to hold negligible ecological value. The rear parcel of land could be used for biodiversity enhancement.
- Copies of these reports are also submitted to Dacorum Council

Opportunity for provision of Public Open Space and an Increase in Biodiversity

- Subject to discussions with DBC, the allocation and development of the Haslam Fields site for housing also offers the opportunity for a substantial area of new public open space of some form to be provided on the Schools land to the rear. The rear element is some 2.76 hectares in area and offers the potential for a nature reserve area, wildlife, walking field, open space or a combination to be provided if appropriate, which would result in a significant gain in biodiversity.
- The provision of public open space and measures to improve biodiversity could be secured through a planning condition, which would be effective in safeguarding the rear of the site from future development. The provision of these planning benefits is considered to provide weight in favour of the proposed allocation.

- The provision of public open space and measures to enhance biodiversity are matters that we would wish to discuss with DBC in further detail.
- Alternatively, if it is subsequently concluded by DBC or an Inspector that this rear land should also form part of a larger housing allocation including the front land and other landholdings, then the school would wish to discuss the appropriate uses of all or part of the rear land. Some opportunity for more limited biodiversity measures should still exist.

Relocated and Enhanced Sports Provision

- It is recognised that planning policy seeks to resist the loss of sports facilities. This is reflected in the relevant technical and consultation documents which state that the front part of Haslam Fields is suitable for housing development, subject to the relocation of the playing fields. To facilitate the development of the land for housing, it is therefore proposed that the existing playing pitches be relocated to a site adjacent to Haresfoot Campus. As there will be no loss of provision, the policy requirement is met.
- The proposed site at Haresfoot Campus is some 5.88 hectares in area, which is more than double the size of the existing pitches only at Haslam Fields (2.78 hectares).
- The sale proceeds from the Haslam Fields housing land would be used to directly fund the construction of the new sports facilities and also to provide the necessary funds for ongoing maintenance.
- The existing facilities are predominantly used by the prep school with some limited ancillary use by Berkhamsted Raiders Football Club as a small part of their wider provision. The new relocated and enhanced facilities would still allow potential opportunities for links with local community groups and other schools to be explored when appropriate.
- The additional funds that would flow from this project would be used to enhance sporting facilities, not only at the Haresfoot Campus, but throughout the Berkhamsted Schools Group estate.
- The School is in the process of reviewing its future education needs and formulating a strategic property plan to look at specific opportunities across the campuses, to strengthen education provision as a whole. The Haslams/Haresfoot relocation is already established as a priority. The funds that flow from this project will play a vital part in ensuring that these longer-term needs can be met and will result in wide community benefits.
- The other reports referred to below, submitted in support of the proposed allocation, demonstrate the problems with the existing Haslam site and show the enhanced quality of sports provision that can be provided at the Haresfoot Campus.

Justification report produced by Berkhamsted School

- The detailed justification report produced by Berkhamsted School sets out the extent and nature

of the current usage at Haslam Fields; identifies the problems encountered; assesses future needs and sets out the benefits of the project from a sport and education provision perspective. The key conclusions of which are as follows:

- The existing facilities at Haslam Fields are unable to support increasing demand for sport at the school and the sporting programmes they wish to implement. There is no scope for expansion at Haslam Fields so as a direct result students are missing opportunities to participate in sport across all ability
- The pitches are in constant use which in turn means that they are rarely rotated and unable to recover easily from excessive wear and surface
- The number of fixtures available will increase by 93% leading to an increase in participation frequency of 114%.
- The use of the pitches in the current location also has an impact upon local residents from car parking and traffic congestion on the local highway.
- The proposals not only replace the existing junior sports facilities at Haslam Fields but also provide the option for some additional pitch/match provision for older age groups as overflow to the Chesham Road playing fields which are heavily congested and prone to cancellation due to over use.

TGMS Ltd Report

- The TGMS Report provides an assessment of the quality of the sports pitches at the existing site. The clear conclusion, which is also clear from the School's direct experience, is that there are many practical issues with the existing facilities which impact upon effective usage. It makes clear that only half of the pitches comply with Sport England guidance.
- The report analyses the existing site and compares the current sports provision at Haslam Fields to the proposed replacement facilities at Haresfoot Campus, having regard to Sports England guidelines. The report concludes that there are many benefits achieved from the relocation.
- The full TGMS report is submitted for your information, but the executive summary provides a useful table (inserted below) which summarises the key improvements in provision. It shows that when assessed against Sports England guidelines, the proposed site represents a substantial improvement on the existing in the majority of areas, and is equivalent to the existing in the remaining areas. Sports England have been consulted and accept the reports contents (see later comment).

Relocation acceptable in Planning Terms

- It is clear from the above assessment that the School has the opportunity to provide significant improvements to its sports facilities by developing the new facilities at Haresfoot Campus. The land

area available for sport will be doubled and the quality of facilities will go well beyond those currently at Haslam Fields.

- A move to Haresfoot Campus allows the potential to develop first class sports facilities for the School and this will in turn therefore benefit the local community.
- As well as improved sports facilities there are also benefits for the amenity of local residents near Haslam Fields as the provision for car parking and coach travel will be taken away from the local highway and into a much more self-contained environment.
- The change also allows scope for visiting teams and parents to utilise the existing facilities at Haresfoot Campus for after match refreshments, as opposed to the current arduous practice of having to travel to another campus within the town after matches, with the impact and added congestion that entails.
- The level of facilities required can be accommodated fully at Haresfoot Campus and preliminary layouts are provided at Appendix 1. It should be noted that the majority of the proposal is for open grass pitches. There are no proposals for artificial pitches, nor floodlighting, or obtrusive fencing. There is a small-scale pavilion which can be sensitively designed and appropriate areas for car parking.

Acceptable impact in Openness of Green Belt

- The proposed use of Haresfoot Campus for outdoor sport and recreation constitutes an appropriate use within the Green Belt.
- Paragraph 89 of the NPPF confirms that the provision of outdoor sports facilities are not defined as inappropriate development within the Green Belt, subject to preserving openness. The provision of playing pitches will have no impact at all on openness.
- The proposed use is considered to be acceptable having regard to policy CS5 of the Core Strategy which relates to development within the Green Belt. It states that the Council will apply national Green Belt policy to protect the openness and character of the Green Belt, and that small scale development will be permitted for buildings defined as appropriate in national policy.
- The pavilion building would be located sympathetically, close to the existing buildings beyond the southern boundary of Haresfoot Campus. This would ensure built development remains concentrated to one area, maintaining the openness of the site as a whole. In addition, it would ensure that the pavilion is seen in context with the neighbouring buildings.
- In terms of design, the building would be constructed of natural materials and could be designed to have a barn like appearance (i.e. timber clad). This would give the building a rural

appearance in- keeping with its Green Belt location.

- No obtrusive fencing would be erected on the site boundaries and no artificial lighting is proposed. Furthermore, no 3G pitches are proposed. During the summer months the sports track would simply be marked out on the grass, and the cricket nets would not incorporate an artificial surface.

Amenity of Residents

- The proposed sports use would not have an adverse impact upon the amenities of the occupiers of nearby properties.
- The immediate vicinity only contains a very small number of residential properties. Three dwellings are located adjacent to Chesham Road to the North West and one on While Hill to the North East. Given the expansive nature of the site, sports use would not harm the amenity of surrounding occupiers. Existing trees and landscaping will be maintained and also enhanced where appropriate. The final detailed layout for the sports pitches and ancillary facilities will be determined at subsequent planning application stage but the initial plans have been designed with a view to minimising any possible limited impact.
- No artificial lighting is proposed and therefore the proposed use would not harm the amenities of neighbours due to excessive light. The lack of floodlights will prevent sports uses taking place late in the evening.
- The site is sustainably located close to the A41 junction for Chesham and Berkhamsted. It is therefore in a highly accessible location where the existing road infrastructure is already capable of supporting the number of traffic movements associated with the sports pitches. In highway terms this is an improvement upon the situation at Haslam Fields which is problematical.

Planning policy support for improved sports provision at schools

- There is a clear link between outdoor sport and health and the Government seeks to encourage people to lead more active and healthier lives.
- Supports the provision of facilities for education and outdoor sport and the Government's objective to secure such facilities is a material factor in support of the proposed allocation.
- Paragraph 70 of the NPPF seeks to deliver a variety of social and recreational facilities and services and states that planning policies and decisions should "plan positively" for their provision and use.
- Paragraph 73 also advises that access to opportunities for sport and recreation can make an important contribution to the health and well-being of communities.
- Paragraph 162 provides advice on the provision of infrastructure, which includes facilities for education.
- Paragraph 171 provides advice on the provision of facilities for health and well-being. It states

that local planning authorities should understand and take account of the health status and needs of the local population, with specific reference to the provision of facilities for sport and recreation. The proposed development meets this objective.

- It is clear that National and local planning policies and guidance support the provision of facilities for outdoor sport and education, as summarised below:
- **National Planning Policy Framework**
- Our proposal results in a significant increase in participation being possible in sports and exercise, further details of which are contained within the School justification document.

Dacorum Borough Council Core Strategy

- Recognises the contribution of the education sector to the provision of jobs within Dacorum. The improved sports pitches are part of a number of measures that would assist the School in attracting and retaining pupils and this would safeguard the range of employment opportunities which exist at the Berkhamsted School Group
- Paragraph 15.1 of the Core Strategy states that the well-being of Dacorum's communities depends on having the appropriate 'social infrastructure'. Figure 14 confirms that social infrastructure includes education facilities and also facilities for outdoor leisure and sport.
- Paragraph 15.11 of the core strategy recognises that the private sector has a strong presence in the borough and "plays an important role in providing independent school places". The improved sports pitches would help to strengthen the overall quality of the education that can be provided at Haresfoot Campus and the Berkhamsted School Group.
- Paragraph 15.21 specifically advises that "opportunities for sport and recreation will be supported".
- Policy CS23 states that social infrastructure "will be encouraged" and that "the provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt". There is a need for such facilities and the proposal would have minimal impact on the Green Belt.

Local Support

- Unlike other highly contentious proposals that are put forward for the release of Green Belt land for housing on the edge of Berkhamsted, this project is likely to receive a good degree of local support, due to the enhancement in sports facilities that would ensue and the further investment in education and wider community benefits that will flow. Put simply, The School will reinvest into local infrastructure unlike other commercial landowners.
- The significant positive economic and community impact that the School has in the area is recognised by the Oxford Economics Report dated

2014, further details of which are provided within the School Justification Document.

- Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School's plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and traffic movements
- A key component and driver of the School's plan is the relocation of Haslam Fields sports provision to Haresfoot.

Sport England Support

- Pre-Application advice has been obtained from Sport England, in respect of the proposed redevelopment of the existing sports pitches at Haslam Field and their replacement with enhanced sports provision at Haresfoot (Sport England Pre App Ref: E/DM/2017/47222/P). The pre-app response confirms that the principle of the proposal would meet all of the criteria in exception E4 of Sport England Playing Fields Policy: 'A Sporting Future for the Playing Fields of England' and would be acceptable having regard to Paragraph 74 of the NPPF. Sport England is a statutory consultee on planning applications relating to sports provision and their positive response carries significant weight.

Timing

- In addition to making representations into the single local plan review process, at the appropriate time, planning applications would need to be submitted on both Haslams Field and the receptor site adjoining Haresfoot Campus. The new sports facilities would then be laid out prior to the housing site being redeveloped.
- From the School's perspective there is an urgent, immediate need for the relocation to occur and for the capital receipt to be generated to release funds for vital sports and wider education projects. In light of this and the urgent need for housing sites, we consider the site should be allocated for development through the single Local Plan Review process with no delay to the timing of release.

Conclusion

- In conclusion, for the reasons stated above, it is considered that the Haslam Fields site should be allocated for housing development in the forthcoming single Local Plan with the existing playing pitch provision relocated to the Haresfoot Campus.
- The Haslam Fields site is in an accessible and sustainable location on the edge of Berkhamsted and borders existing and allocated development on three sides. The site is directly adjacent to an existing housing allocation at Hanburys, which was brought forward as a local allocation in the Core Strategy due to its sustainable location (the

	<p>proposed site at Haslam Fields has the same level of sustainability).</p> <ul style="list-style-type: none"> • The site is supported in all independent technical reports and in particular in the Phase 2 Green Belt Review is the only site at Berkhamsted categorised as “weakest”. • The proposal includes the relocation of the existing playing pitches to a site adjacent to Haresfoot Campus, which will result in a significant enhancement of provision and is fully acceptable in planning policy terms. • It is considered that Haslams Fields is the most suitable site in Berkhamsted to be released from the Green Belt and its development would provide much needed housing to contribute towards DBC’s overall housing need. • Vindication of this is provided by the fact that the original version of the draft Issues and Options consultation produced by DBC officers for Cabinet consideration proposed that Haslam Fields was a “suggested option” as a housing allocation. • It is apparent that whatever option for housing numbers is finally progressed out of those suggested and with a dispersal approach including growth at Berkhamsted, which as the second largest town is entirely appropriate, then Green Belt releases will be required and the School’s land at Haslam Fields is recognised as the most suitable option at Berkhamsted. • If Haslam Fields were allocated for housing development there is an opportunity for further planning gain, with consideration being given to the rear land being safeguarded for some form of public open space, wildlife site/nature reserve/walking field and/or nature reserve if appropriate. • If DBC or the local plan inspector ultimately determines that all of the School’s land in this location should form part of a larger housing allocation then the School would also support that stance, but the release of the Haslam Fields front section should not in any way be prejudiced or delayed by the wider proposals as that would be inappropriate and delay the flow of benefits that would arise. • Berkhamsted School are in the process of preparing a strategic master plan to prioritise and guide key projects in future years in a comprehensive and sustainable manner. The implementation of the School’s plan will not only help to accommodate future growth but will over time likely deliver wider community benefits on issues including education; sport & recreation; parking; transport and movements. • A key component and driver of the School’s plan is the relocation of Haslam Fields sports provision to Haresfoot. As a consequence of all the above we consider that a Green Belt release at Haslam Fields is appropriate and should be supported.
<p>Include files</p>	<p>Kevin Rolfe Images Appendicies and Sport England Statement.pdf</p>

Number	Question 46
ID	LPIO22600
Full Name	Berkhamsted Schools Group
Company / Organisation	The Berkhamsted Schools Group
Position	
Agent Name	Kevin Rolfe
Company / Organisation	Aitchison Raffety
Position	Group Director, Development & Planning
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Additional letter to the documents and information inputted previously (LPIO22578-22599)</p> <p>PROPOSED SITE ALLOCATION - LAND AT HASLAM FIELDS AND LAND ADJOINING HARESFOOT CAMPUS (REF BE-H2)</p> <p>Further to our recent discussions, I would be grateful for this letter to be formally added to our original submission in respect of the emerging Dacorum Local Plan, and considered as part of the Council's forthcoming site evaluation work.</p> <p>The Berkhamsted School group experiences significant issues with attracting and retaining new teachers due to the high cost of housing in the local area. Clearly, having teachers very close to local schools has many operational and environmental benefits. The School operates a policy of assistance where appropriate, involving subsidised rent during employment.</p> <p>The School continues to explore various options for enhancing teachers accommodation provision locally and one strong option (subject to ongoing detailed assessment and viability) would be to have an element of new dwellings on the Haslam Fields site, as part of an allocation for housing.</p> <p>We confirm that he any allocation of Haslam Fields for housing would provide the relevant policy compliant affordable housing provision and to this end, the School has had initial discussions with Hightown Housing Association.</p> <p>In addition, we are exploring possible ways and assessing the viability of a further 10% of the completed dwellings being delivered for School teachers at discounted rent. The provision of such accommodation is in essence additional "affordable housing" (affordable rent) providing for an identified local need. This extra amount of "affordable housing provision" is another key advantage that the allocation of Haslam Fields for housing would deliver, over and above that offered by other green belt sites.</p> <p>The occupation of completed dwellings on site by local teachers is also a highly sustainable solution, as teachers could easily walk or cycle to work. The Haslam Fields site does of course score very highly from a sustainability point of view, proven by the fact that it immediately adjoins Hanbury's which was the only former</p>

	<p>green belt Berkhamsted site progressed via the last local plan review.</p> <p>We are also mindful that, due to the high housing numbers required within the DBC area as a whole, that it may be decided that there is also a need to allocate additional School land immediately to the rear of the Haslam Fields playing fields, which the School would also support if preferable. If this were to happen then there would of course be an even stronger case for the additional teachers accommodation /additional affordable housing accommodation to be delivered.</p> <p>In conclusion, the potential provision of staff accommodation on the subject site would deliver further planning benefits which together with the wider community benefits that would flow from this project,(open space/biodiversity/enhanced sports provision/funds to deliver the Schools strategic plan) as set out in our detailed submission, ensures in our opinion that this site is the best of any option for a green belt release in Berkhamsted.</p> <p>We look forward to continuing to engage with the local plan process as it moves forward and should you wish to ask anything at any time please do not hesitate to get in touch.</p>
Include files	Kevin Rolfe - DBC letter 05.07.18.pdf
Number	Question 46
ID	LPIO22601
Full Name	Mr & Mrs Mehew
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 write as residents of [REDACTED] in response to your consultation on the Local Plan to 2036. We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) (see comments LPIO18384, 18385) and the draft response prepared by Berkhamsted Town Council.</p> <p>In summary we believe that the country needs more housing for all the reasons outlined by politicians of various parties but when it comes to Dacorum we think that the new proposals are unnecessarily skewed to the outlying areas of Dacorum including Berkhamsted. Major growth should be confined to Hemel Hempstead which is a former new town and best equipped to deal with development and change together with the need for affordable housing. We simply do not understand why, when Hemel is already behind target with its housing programme and Berkhamsted is above target, even more</p>

houses are planned for Berkhamsted. If we have to choose an option it would be 1B which limits building in Berkhamsted to the 600 houses already planned. Berkhamsted lies in a steep sided valley with growing infrastructure concerns. Traffic flows across town are already impeded by route restrictions over or under the railway and the Grand Union Canal.

In particular we note the choice of potential development sites being considered for inclusion within the Plan and specifically Be-h3; Land at Ivy House Lane. We are commenting on this site under Question 46 of the Consultation Local Plan. We have also seen a copy of a letter sent by dha planning to the Clerk of Berkhamsted Town Council on 29 November 2017 in connection with this land at Ivy House Lane. In their letter dha planning refer to potential concerns over the site and mention a Landscape and Visual Study commissioned by their client which apparently concludes that any housing development would have no significant adverse landscape effects on the setting of the Chilterns AONB. The site is an area of Green Belt (which as recently as October 2012 was ratified as this in the report by the Inspector on the Dacorum Core Strategy) always used as cultivated arable farmland alongside a very narrow country lane and adjacent to the CAONB. Quite how a proposed development of some 150 houses on the land, including light pollution and the potential for flooding, will not have a detrimental effect on the AONB is difficult to understand. The consultants also refer to proposed "new and improved pedestrian and cycle links." Given that there are no pedestrian or cycle links anywhere near the site it is difficult to see how the proposals will help ease links.

However what the consultants do not refer to is access which above all else must determine whether the site is anyway practicable for development. The site is bordered on one side by Meadway the road we live in. This is a private road and we have no intention of bringing it up to the standard required for it to be adopted. Hunters Park also borders the site but so far as we know there are houses and gardens lining the field. A house or houses would have to be demolished to gain access to the field. This does not seem feasible as the residents of Hunters Park are also objecting to the Ivy House Lane development. Both Meadway and Hunters Park have access to Gravel Path which is a road on a steep hill barely changed in outline since the days of horse and cart and today with all the problems of increasing traffic flows. At the top side of the site are another group of houses on a private road, even less made up than Meadway, with across their road a ribbon of woodland where the deer travel to and from Ashridge. This leaves the fourth side Ivy House Lane bordering the site. To make the lane a point of access would require significant structural changes including widening the lane to permit two way traffic. We will not rehearse the arguments about the viability of using Ivy House Lane or for that matter Gravel Path as access into Berkhamsted, but both roads have at the bottom of the hill the twin pinch points of railway and canal.

It is difficult therefore to see how practical access to the field can be obtained by the developer and how the infrastructure of services could be put in or the existing infrastructure could cope. As one example homes in Meadway are served by water being pumped up the hill from the town. Any increase in the number of homes to the north of Meadway would simply contribute to the low pressure and outages sometimes experienced during the year. Affinity Water can confirm this point.

In conclusion we believe Dacorum Borough Council should omit Be-h3; Land at Ivy House Lane from the final local plan and chose option 1B as the way forward.

We have also seen and agreed with the response to be submitted by the Meadway Residents Action Group (MRAG) and the draft response prepared by Berkhamsted Town Council.

In particular we note the choice of potential development sites being considered for inclusion within the Plan and specifically Be-h3; Land at Ivy House Lane. We are commenting on this site under Question 46 of the Consultation Local Plan. We have also seen a copy of a letter sent by dha planning to the Clerk of Berkhamsted Town Council on 29 November 2017 in connection with this land at Ivy House Lane . In their letter dha planning refer to potential concerns over the site and mention a Landscape and Visual Study commissioned by their client which apparently concludes that any housing development would have no significant adverse landscape effects on the setting of the Chilterns AONB. The site is an area of Green Belt (which as recently as October 2012 was ratified as this in the report by the Inspector on the Dacorum Core Strategy) always used as cultivated arable farmland alongside a very narrow country lane and adjacent to the CAONB . Quite how a proposed development of some 150 houses on the land, including light pollution and the potential for flooding, will not have a detrimental effect on the AONB is difficult to understand. The consultants also refer to proposed "new and improved pedestrian and cycle links." Given that there are no pedestrian or cycle links anywhere near the site it is difficult to see how the proposals will help ease links.

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In conclusion we believe Dacorum Borough Council should omit Be-h3; Land at Ivy House Lane from the final local plan

Berkhamsted Town Council Response:

Be-h1; Land south of Berkhamsted

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

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

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

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

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

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.

	<p>There would be significant intrusion into the Green Belt, creating urban sprawl and reducing the separation between the town and Bourne End.</p> <p>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."</p> <p>The density is too high for the neighbouring Character Area.</p> <p>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.</p> <p>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.</p> <p>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</p>
Include files	
Number	Question 46
ID	LPIO22648
Full Name	Mr & Mrs P Le'Vin
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 object to the proposed development on the Green Belt land in Kings Langley and Shendish Manor as we believe in the Ethos of a Village and the community held within.</p> <p>Buildings should be done in the Brown Belt areas and not the 'protected' Green Belt.</p>
Include files	
Number	Question 46
ID	LPIO22650
Full Name	Mr & Mrs P Le'Vin
Company / Organisation	

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	With regards to Wayside farm, this is unthinkable that you are even contemplating losing one of the only 2 dairy farms that remains in the area
Include files	
Number	Question 46
ID	LPIO22655
Full Name	Ms Wendy Halford
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 live in XXXX, Tring, and reject in the strongest possible terms any question of developing houses in Grove Fields or next to Marshcroft Lane (forgive me, I can't remember the names of those sites.) Marshcroft Lane is just that - a lane. It is used by many members of the public, who enjoy strolling, cycling, dog-walking, horse-riding etc in a quiet lane, which leads directly to the countryside. It is a narrow lane, and parking is already quite difficult. The very idea of creating a road between Station Road and Bulborne Road is monstrous - Marshcroft Lane would become an access road to Grove Fields, and that is not sustainable, in my view. It would completely destroy the peaceful location, which was largely the reason for me choosing to live here.</p> <p>So please put a big NO next to those two sites, and the proposed road crossing Marshcroft Lane.</p>
Include files	
Number	Question 46
ID	LPIO22657
Full Name	Ms Wendy Halford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	Tring and Berkhamsted are small market towns. Without massive new infrastructure (where?) it will be impossible to accommodate the needs of all the proposed new

	residents - schools, doctors, hospitals, pubs, entertainment, shops, recreation.
Include files	
Number	Question 46
ID	LPIO22658
Full Name	Ms Wendy Halford
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	I believe you have considered the infrastructure, environment, health of people etc, to name but a few issues - all of these are hugely important - Hemel Hempstead is a fading and unpleasant town to visit. So much work needs to be done to regenerate it. If Hemel was a bustling, clean shopping district, maybe with a theatre and other amenities, the area would feel so much nicer to shop in. I can't remember the last time I went - I avoid it now. So if you're planning new homes, you need to look at the town first
Include files	
Number	Question 46
ID	LPIO22667
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>The Schedule of Site Appraisals takes into account the adopted Mineral Consultation Area (MCA) within the "Affects Key Environmental Designations" section of each proforma and all references to it are correct. The county council has recently published a Regulation 18 Draft Minerals Local Plan which contains Mineral Safeguarding Areas (MSAs) and MCAs for sand and gravel reserves, and a MSA and MCA for Brick Clay reserves. The MSA and MCAs cover the same area as one another. Once adopted, these MSA / MCAs will replace the existing MCA. The MSA / MCAs in the Draft MLP both cover areas of Dacorum. The following sites identified in the Schedule of Site Appraisals are located within the draft MSA / MCAs:</p> <ul style="list-style-type: none"> • HH-h2 – North of Gadebridge (minor overlap with Sand & Gravel MSA / MCA) • HH-H3 – Land at Shendish, London Road (partial overlap with Brick Clay MSA / MCA)

- HH-e1 – Land east of A41 at Felden (minor overlap with Brick Clay MSA / MCA)
- Be-h1 – Land south of Berkhamsted (entirely within Brick Clay MSA / MCA)
- Be-h2 – Haslam Fields, Shootersway (entirely within Brick Clay MSA / MCA)
- Be-h4 – Land between Durrants Lane / Darrs Lane / Bell Lane (two sites) (partial overlap with Brick Clay MSA / MCA)
- Be-h6 - Land adj. to Blegberry Gardens, Shootersway (entirely within Brick Clay MSA/MCA)
- Be-h7 – Land at Bank Mill Lane (entirely within Sand and Gravel MSA/MCA)
- Be-h8 – Berkhamsted Golf Range, The Brickworks, Spring Garden Lane (entirely within Brick Clay MSA/MCA)
- Bov-h1 – Land at Grange Farm, Green Lane (entirely within Brick Clay MSA/MCA)
- Bov-h2 – Land south east of Homefield (entirely within Brick Clay MSA/MCA)
- Bov-h3 – Land r/o Green Lane / Louise Walk (entirely within Brick Clay MSA/MCA)
- Bov-h4 – Land at Duckhall Farm, Newhouse Road (entirely within Brick Clay MSA/MCA)
- KL-h1 – Land at Hill Farm, Love Lane (entirely within Brick Clay MSA/MCA)
- KL-h2 – Land at Rectory Farm, Hempstead Road (entirely within Sand and Gravel MSA/MCA)
- KL-h3 – Land to the east of A41 and Wayside Farm, Watford Road (partial overlap with Sand and Gravel MSA/MCA, minor overlap with Brick Clay MSA/MCA)

The location of a proposed site within the adopted MCA or emerging MSA/MCAs does not prevent non-mineral development from taking place. It prompts a consultation process between the borough and county councils. The consultation allows the mineral planning authority to determine whether they require the applicant to extract mineral prior to non-mineral development which would ‘sterilise’ the mineral resource (that is, made unavailable for future extraction and use) and preclude its future extraction and use.

As well as seeking prior extraction of minerals before non-mineral development where appropriate, adopted Minerals Policy 5: Mineral Sterilisation encourages the ‘opportunistic extraction’ of mineral for use on site prior to non-mineral development. A commitment to consider ‘opportunistic extraction’ for use on site would prevent the entire mineral reserve being sterilised where a full extraction operation was deemed unnecessary or unviable. The promotion of ‘opportunistic extraction’ is also proposed within the Regulation 18 Draft Minerals Local Plan and could be referred to within the “Protection of Mineral Resource and Uses for Historic Workings” policy.

Include files	
Number	Question 46
ID	LPIO22668

Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Bovingdon Brickworks</u></p> <p>As the only brickworks in the county, Bovingdon Brickworks is a safeguarded and strategic site for the extraction of Brick Clay and production of bricks. This safeguarding is also proposed within the Regulation 18 Draft Minerals Local Plan. Two sites have extant permission for the extraction of Brick Clay near to the brickworks (at Pocket's Dell Quarry and Land at Cox and Croft Field, Shantock Hall Lane).</p> <p>It is understood that the brickworks has recently stopped extracting Brick Clay and producing bricks and is now selling its existing stock of bricks. Whilst the infrastructure for brick production remains, it remains the council's intention to safeguard the site in the emerging Minerals Local Plan.</p>
Include files	
Number	Question 46
ID	LPIO22724
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><i>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 note which accompanies it?</i></p> <p>The location, layout and design of any new settlements or settlement extensions should be informed by landscape and visual impact assessments, and landscape sensitivity and capacity studies, to ensure that development can be accommodated without causing unacceptable harm to landscape character and visual amenity.</p> <p><u>Natural, Historic & Built Environment Advisory Team consideration of the archaeological implications of the proposal sites</u></p> <p>The Schedule of Site Appraisals Working Note Framework in Appendix A, section 8 fails to acknowledge that a heritage asset does not necessarily need to be designated or identified in the local plan to warrant conservation. It should do so because NPPF paragraph</p>

139 notes that if it has been demonstrated that a heritage asset has equivalent significance to a scheduled monument then it should be treated in the same way (NPPF paragraph 139). It should also do this because one of the objectives of section 8 is to identify heritage assets. If these are currently unidentified then their significance is not known and it may be sufficient to be considered under NPPF paragraph 139.

We have undertaken a rapid appraisal of the archaeological implications of development for the areas identified in the consultation.

1 Archaeology as a Development Constraint

KL-h3 Land to the east of A41 and Wayside Farm, Watford Road.

(The site contains Scheduled Monument 11516 *Little London moated site and surrounding enclosures.*)

1 Requirement for Pre-allocation Archaeological Assessment or Evaluation

The sites below include, or have the potential to include, heritage assets with archaeological interest of sufficient scale and significance for there to be a risk that archaeology could be a constraint on development. We would therefore recommend that – in accordance with NPPF policies 128, 135 and 139 – the LPA requests that archaeological assessments should be produced for these sites before they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the sites, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. The purpose of the archaeological assessment would be to provide sufficient information about the archaeological interest of the sites and in particular the extent to which this might be a constraint upon the principle of development.

NHBE would be happy to advise on the scope of any further archaeological work.

Ref

Site

HH-h1a

North Hemel Hempstead (Phase 1)

HH-h1b

North Hemel Hempstead (Phases 1 and 2)

HH-h2

North of Gadebridge (Land at Piccotts End)

HH-h3

Land at Shendish, London Road

Be-h1

Land south of Berkhamsted

Be-h4

Land between Durrants Lane / Darrs Lane / Bell Lane
(two sites)

Be-h7

Land at Bank Mill Lane

Be-h8

Berkhamsted Golf Range, The Brickworks, Spring
Garden Lane

Tr-h5

Land at Dunsley Farm, London Road

KL-h2

Land at Rectory Farm, Hempstead Road

Requirement for Pre-application or Pre-determination
Archaeological Assessment

The sites below include, or have the potential to include, heritage assets with archaeological interest. However, we do not believe there to be a high risk that the archaeological interest will be a constraint on the principle of development of the scale proposed, although in some instances the archaeological interest could affect the precise numbers of dwellings or the design of development proposals, should they be adopted.

For these sites NHBE would therefore wish that – in accordance with Government NPPF policies 128, 135 and 139, the LPA requests that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation.

NHBE would be happy to advice on the scope of any further archaeological work.

Ref

Site

HH-e1

Land east of A41 at Felden

Be-h2

Haslam Fields, Shootersway

Be-h3

Land at Ivy House Lane

Be-h5

Land at Lockfield, New Road, Northchurch

Be-h6

Land adjacent to Blegberry Gardens, Shootersway

Tr-h1

Land to the north of Station Road

Tr-h2

Land west of Marshcroft Lane

Tr-h3

Land at Icknield Way / Grove Road (New Mill)

Tr-h4

Land at Cow Lane / Station Road

Tr-h6

Land north of Icknield Way (Waterside Way)

Bov-h1

Land at Grange Farm, Green Lane

Bov-h2

Land south east of Homefield

Bov-h3

Land r/o Green Lane / Louise Walk

Bov-h4

	<p>Land at Duckhall Farm, Newhouse Road</p> <p>KL-h1</p> <p>Land at Hill Farm, Love Lane</p> <p>My-h1</p> <p>Land south of Markyate</p> <p>My-h2</p> <p>Land at Pickford Road</p> <p>O-h1</p> <p>Land at Old Kiln Meadow, Water End Road, Potten End</p> <p>O-h2</p> <p>Land to the north east of Grange Road, Wilstone</p> <p>This rapid assessment has concluded that – based on current knowledge – the archaeological interest of the remaining sites can be conserved by appropriate planning requirements imposed by the LPA, should planning permission be approved. However, this advice could change for any of the sites if new information comes to light at any point.</p> <p>None at this time</p>
Include files	
Number	Question 46
ID	LPIO22725
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes

Your response - Please add your response here

Transport, Access and Road Safety Unit (TARS)

HH-h1a North Hemel Hempstead (Phase 1) 1750–2250 homes

This site is poorly related to the existing urban area. Agree that it would need a range of infrastructure provided within the site. Currently bus services through Piccotts End are of limited frequency so the site is likely to require a new bus service which would have to operate as a loop as suggested.

HH-h1b North Hemel Hempstead (Phases 1 and 2) 4500 homes

This is rather better related to the existing built up area – there are areas where development would be adjacent existing development which may provide the opportunity for pedestrian / cycle routes through. The larger number of homes would give greater likelihood of sufficient patronage for a new bus service being viable in the long term. The potential link between Redbourn Road and Leighton Buzzard Road would be beneficial for bus routeing as it would prevent the need for a loop. Agree that a range of infrastructure would be needed on site.

HH-h2 North of Gadebridge (land at Piccotts End) c. 440 dwellings

This site is poorly related in relation to the existing built up area which may limit opportunities for walking and cycling. A more limited range of infrastructure is being suggested which may lead to a greater need to travel. Some of the site may be within 400m of bus stops in Piccotts End but bus services are very limited. This site is likely to need significant enhancements to existing bus services or a new route. The size of the site may limit the potential long term viability of any new bus route.

HH-h3 – Land at Shendish, London Road – primary school, 2ha employment use, 900 homes

Geographically this site is close to the existing built up area. There are regular bus services running along London Road and the station is close. However, the sustainability of this site may be limited by the degree of access over the railway line – if there is only going to be one access point, this will increase the distance that future residents will need to travel and may make walking / cycling less attractive. Bus services along Ruckers Lane are limited. Proportion of site over 400m from bus stops depends on directness of access to London Road, but the western portion of the site is likely to be over this distance. Site should therefore be planned to enable a bus loop so that all dwellings are within 400m of a bus service.

HH-e1 Land east of A41 at Felden – B1 employment use

Bus services running along this part of the A414 south of London Road include long distance coach services which have limited stops and a community transport service. However, the north-east corner of the site is likely to be within 400m of bus stops on Two Waters Road to the north of its junction with London Road. These stops are served with a number of bus routes including the 500 / 501 which is a key inter-urban route

in the county. It would be beneficial if the site entrance is on this side in order to reduce the distance needed to travel to these stops and appropriate pedestrian and cycle routes need to be planned in order to reduce the car dominance of this area.

Be-h1 Land south of Berkhamsted – residential (c970), B1 office, education, GP surgery, community centre, village centre

As suggested, this site would need significant new infrastructure provision. Current accessibility to bus services is poor, so significant enhancements to an existing diverted or new bus service would be needed, the east-west road through the site would need to be designed so as to be suitable for bus operation and such that there could be bus stops within 400m of all dwellings. We would not be in support of development at the portion of the site close to the BFI building. This is remote from existing bus services and is likely to be difficult to serve and not generate sufficient patronage on its own to support a new service.

Be-h2 Haslam Fields, Shootersway – 80–100 dwellings

This site is remote from existing bus services. Bus services covering the residential areas of Berkhamsted away from the main corridor along the High Street tend to struggle commercially. This site would be difficult to serve and is not large enough to produce significant patronage to sustain new services. We would not support development at this site.

Be-h3 Land at Ivy House Lane – up to 150 dwellings

Nearest bus stop is over 400m away and bus services from that stop are limited. Site is approx. 1.1 miles from the rail station but topography and lack of footway on some of the roads to the station would discourage walking. .

Be-h4 Land between Durrants Lane / Bell Lane / Darr's Lane (two sites) – 200–225 or 100–125, primary school, clinic

Part of both these sites would be within 400m of bus stops on Westfield Rd and Granville Rd where the 502 / 532 runs. This however only has limited services. The potential for bus services to be diverted to either site would be limited by the suitability of roads around the site for bus operation.

Be-h5 Land at Lockfield, New Road, Northchurch – c. 60 units

The closest bus stops on New Road south of the site are within 400m but are only served by limited 29 / 30 / 31 bus routes. Some of the site would be within 400m of bus stops on the A4251 which are better served. There are opportunities for use of the canal towpath for pedestrians.

Be-h6 Land adjacent to Blegberry Gardens, Shootersway - up to 105 dwellings

This site is remote from existing bus services, would be difficult to serve. We would not support development of this site.

Be-h7 Land at Bank Mill Lane – c. 100 dwellings

It is likely that all of the site will be within 400m of bus stops on London Road with regular bus services available. Pedestrian and cycle route to town centre is relatively level.

Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane – care home, nursery, residential

This is remote from existing bus services and would be difficult to serve. We would not support residential development on this site.

Tr-h1 Land to the north of Station Road – c. 1000 dwellings

This site is of sufficient scale to be able to deliver significant supporting infrastructure as suggested. The development would be close to the station which has up until now always been at a distance from the town, and the potential for a north-east distributor road through the site would enable a new bus route to serve the site.

Tr-h2 Land west of Marshcroft Lane – 77 homes

Most of this site is within 400m of unmarked bus stops served by the 387 route. This is a local town route that links New Mill with the station and runs throughout the day, but more frequently during am / pm weekday commuting times. It also calls at Tesco and in the High Street.

Tr-h3 Land at Icknield Way / Grove Rd (New Mill) – 400 dwellings

There are two pairs of stops on Wingrave Road which would be within 400m of some of the site. These are served by the local town service 387 as well as some limited frequency inter-urban routes. The 387 runs along Grove Road and it may be necessary to add bus stops along the site frontage in order that all dwellings are within 400m of a bus stop.

Tr-h4 Land at Cow Lane / Station Rd – c. 50 units

The entire site is likely to be within 400m of bus stops on Station Road which are served by the local town service 387 and a couple of other less frequent services. The site is less than a mile from Tring station so there is potential for walking / cycling.

Tr-h5 Land at Dunsley Farm, London Road – mixed use, employment and residential

Most of this site is likely to be within 400m of bus stops on London Road or Cow Lane. Cow Lane is however much less well served by buses than London Road. Therefore, it is likely that a bus service diversion would be needed through the site to ensure all dwellings are within 400m of satisfactory bus services. The site should be designed so as to allow bus operation through it and Cow Lane may need to be improved to facilitate bus access.

Tr-h6 Land north of Icknield Way (Waterside Way) – up to 300 homes

Some of this site would be within 400m of bus stops on Wingrave Road served by the local town route 387 and a limited range of other routes. At the moment, the 387 terminates at the northern pair of stops on Wingrave Road. If this development goes ahead however, it may

be beneficial for the route to be extended back to the site so that all dwellings are within 400m of a bus stop. This would require some sort of bus turning facility to be designed as part of the site.

Bov-h1 Land at Grange Farm, Green Lane – 130 dwellings, 60 bed nursing home, pre-school facility

There is a pair of stops outside the site on Green Lane – one is unmarked. They are however only served by one local bus route (and one school route) which is hourly. There are also 3 stops (2 unmarked) east of the site around the junction of Green Lane with Water Lane although services from there are limited. Bus services in the vicinity may not be sufficiently frequent to attract much patronage and the site is unlikely to be able to contribute significantly to service improvements.

Bov-h2 Land south east of Homefield – approx. 130 dwellings

Most of the site is likely to be within 400m of bus stops on Green Lane although the main local bus route here is only hourly. Approximately 500m from village centre which may encourage walking / cycling.

Bov-h3 Land r/o Green Lane / Louise Walk – 60–75 dwellings

Most of the site is likely to be within 400m of bus stops on Green Lane although the main local bus route here is only hourly. Within walking/cycling distance of village centre.

Bov-h4 Land at Duckhall Farm, Newhouse Rd - 50+ units

The north-western portion of this site is over 400m from a bus stop. Nearest bus stops are located on Hempstead Rd. Bus services available are of limited frequency – the main route is only hourly. The site is however within walking / cycling distance of the village centre.

KL-h1 Land at Hill Farm, Love Lane – 150-300 units

A significant portion of this site is over 400m from existing bus stops. Nearest bus stops on Langley Hill and Chipperfield Road are served by one bus route which only has limited services. The site is approximately 800m from the site frontage to the High Street so is within walking / cycling distance, but the potential for this site to be sustainable is limited by access to bus services that would be difficult to improve.

KL-h2 Land at Rectory Farm, Hempstead Road – residential – numbers TBC

The entire site is within 400m of bus stops on Hempstead Road with regular bus services available. The site is within walking / cycling distance of the village centre.

KL-h3 Land to the east of A41 and Wayside Farm, Watford Road – residential, employment or mixed use

The western portion of this site would be over 400m from a bus stop. The nearest bus stops are on Watford Road which is well served in relation to inter-urban bus routes. There are also stops on Langley Hill although it is not clear whether there is a walking route through and bus services here are rather limited. The site would need to

	<p>be designed so that buses could serve the site and all dwellings are within 400m of a bus stop. The eastern part of the site is well located in relation to access to bus services, and is within walking / cycling distance of the station. Access through to Langley Hill would improve potential sustainability of the northern part of the site as this would facilitate access to the village centre.</p> <p><u>My-h1 Land south of Markyate – up to 150 residential units</u></p> <p>Most of the site is within 400m of bus stops on London Road. Bus routes include the hourly 34 between St Albans and Dunstable and hourly 46 between Luton and Hemel Hempstead. The site is within walking / cycling distance of the village centre.</p> <p><u>My-h2 Land at Pickford Road – 25 units</u></p> <p>This site is over 400m from bus stops and is a significant distance from the village centre. The small proposed development size would however limit its impact.</p> <p><u>O-h1 Land at Old Kiln Meadow, Water End Road, Potten End – 45–49 dwellings</u></p> <p>This site is over 400m from existing bus services. The limited services of Potten End are likely to lead to residents needing to travel further afield. The small proposed development size would however limit its impact.</p> <p><u>O-h2 Land to the north east of Grange Road, Wilstone – 30–42 residential units</u></p> <p>A small portion of the site close to Grange Rd would be within 400m of bus stops on Tring Rd. The most frequent service from here is the 164 between Marsworth and Aylesbury which is 1½-2 hourly and has limited coverage of the day. The limited services of Wilstone are likely to lead to residents needing to travel further afield. The small proposed development size would however limit its impact.</p>
Include files	
Number	Question 46
ID	LPIO22726
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p>

	<p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>HH-h1a: North Hemel Hempstead (Phase 1)</u></p> <p>Ecology to be confirmed (TBC). Further work will consequently be required to inform ecological impacts. Largely arable but site includes a WS, adjacent to WS, historic hedgerows and an old orchard site. These should be protected. It will reduce the connectivity to ecological sites within Hemel. How big will the proposed 'Parkland Buffer' be? Its management should be considered. SAC impact likely to require SANG. No obvious fundamental ecological constraints known within the site but indirect impacts important and loss of agricultural ecology.</p>
Include files	
Number	Question 46
ID	LPIO22727
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>HH-h1b: North Hemel Hempstead (Phases 1 and 2)</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Largely arable. Site adjacent to WS on edge of Hemel which must not become isolated; connectivity to ecological sites within</p>

	Hemel (woodland WS) further compromised. Ancient boundary features should be retained. SAC impact likely to require SANG. Parkland Buffer – size and management required. No obvious fundamental ecological constraints known within the site but indirect impacts very important and loss of agricultural ecology.
Include files	
Number	Question 46
ID	LPIO22730
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as ‘biodiversity’ referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>HH-h2: North of Gadebridge (Land at Piccotts End)</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Grassland. Significant impact on green corridor along Gade Valley into Hemel which must be addressed. Adjacent to WSs and other woodland. Significant loss of grassland. SAC impact likely to require SANG contribution. No obvious fundamental ecological constraints known within the site but indirect impacts important and loss of agricultural ecology.</p>
Include files	
Number	Question 46
ID	LPIO22732
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>HH-h3: Land at Shendish, London Road</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Intimate mosaic of woodland, grasslands and hedgerows, may also be some interest in golf course. No obvious fundamental ecological constraints in respect of recognised value known within the site but indirect impacts and locally significant loss of grassland and woodland likely to require compensation through biodiversity offsetting.</p>
Include files	
Number	Question 46
ID	LPIO22734
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no</p>

	<p>different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>HH-e1: Land east of A41 at Felden</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Adjacent to SSSI and SSSI replacement land for compensation of loss due to A41. Loss of arable of no obvious fundamental ecological constraint in respect of recognised value known within the site but indirect impacts on adjacent land. Almost last area left to lose in the local area following loss of woodlands and grassland due to roads and built development within area which is now thoroughly degraded. Will further effectively isolate SSSI. Financial contribution to support SSSI and adjacent grassland management would be appropriate to mitigate local degradation of habitat connectivity.</p>
Include files	
Number	Question 46
ID	LPIO22736
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h1: Land south of Berkhamsted</u></p> <p>Further ecology work will be required to inform ecological impacts. Two WS, grassland, arable and hedgerows. Brickhill Green is a significant constraint for a number</p>

	of reasons, ancient common of remnant and extant ecological value. Loss of ecological connectivity along A41 corridor on N side. Otherwise no obvious fundamental ecological constraint in respect of recognised value known within the site. Creation of additional open space and biodiversity gain not physically possible if it is to be built on – a poor sustainability conclusion if common already exists.
Include files	
Number	Question 46
ID	LPIO22738
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h2: Haslam Fields, Shootersway</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Grassland - loss of potentially reasonable grassland to SW and impact on hedgerows. Loss of E-W ecological connectivity. No obvious fundamental ecological constraint in respect of recognised value known within the site. Biodiversity offsetting may be required if grassland shown to be moderately valuable although if promoted as open land of biodiversity value this is welcomed. However, in this respect there is no gain as it already exists although management could be secured and enhanced. Use as POS will increase disturbance and degrade some ecological benefits.</p>
Include files	
Number	Question 46
ID	LPIO22740

Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h3: Land at Ivy House Lane</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Arable. No obvious fundamental ecological constraint in respect of recognised value known within the site. Local boundary features should be retained. Some contribution to SANG given location.</p>
Include files	
Number	Question 46
ID	LPIO22742
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p>

	<p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h4: Land between Durrants Lane / Darrs Lane / Bell Lane (two sites)</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Large arable fields. No obvious fundamental ecological constraint in respect of recognised value known within the site. Local boundary features should be retained. Country Park proposal are welcomed but hardly credible given availability of undeveloped land and small size.</p>
Include files	
Number	Question 46
ID	LPIO22744
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h5: Land at Lockfield, New Road, Northchurch</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Locally significant area of rough grassland within river valley. No obvious fundamental ecological constraint in respect of</p>

	recognised value known within the site. Likely limited intrinsic interest but locally significant loss of habitat resource. Biodiversity Offsetting contribution should be sought as well as contribution to SANG given location of development – proportionate to the size of development and potential impacts
Include files	
Number	Question 46
ID	LPIO22746
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Rectory Farm is designated an area of “Outstanding Natural Beauty”. The site consists of approximately 20 acres of farming land, including just over one acre of dilapidated farm buildings, located on the north side of Kings Langley. Access is via Gade Valley Close, which runs along the southern border. On the west the farm is bordered by Hempstead Road (A4251), and the Grand Union Canal runs along the eastern border. To the north are pitches owned by Kings Langley Football Club.</p> <p>The property is Green Belt land and subject to Article 4 Direction. It is also subject to a planning policy regarding nature conservation in Dacorum Borough’s river valleys.</p> <p>Until Dacorum’s Local Plan Review is completed, planning permission is unlikely to be granted for building new homes outside the 1.1 acre footprint of existing farm buildings</p> <p>Part of the farmland lies at the same level as the Grand Union Canal, and has occasionally been partially flooded from leaks in the canal bank.</p> <p>Any increase in traffic to the farm would require a new access route to be established by building a new mini-roundabout on the A4251. This could be located opposite the Toby Carvery, or else at the junction with Coniston Road which would impact the land owned by Kings Langley Football Club</p> <p>Farming land - Producing food for local consumption</p> <p>Since 2014, Transition in Kings (TiK) has engaged local volunteers in producing vegetables for sale at the monthly Kings Langley Market. On a very small scale, this effort demonstrates the potential for a much larger and more efficient food producing business at Rectory Farm, possibly based on “pick-your-own” fruit and vegetables together with modern systems for producing year-round fresh vegetables.</p> <p>In addition the Sunnyside Rural Trust at Hemel Hempstead has a track record of developing the life skills of people with learning disabilities through engaging in horticultural activities. By leasing 5-10</p>

	<p>acres at Rectory Farm, the Trust would be able to continue their valuable community work in Kings Langley, as the Two Waters Masterplan is looking to displace these vulnerable people who need to be able to work and engage in their local community.</p> <p>Wildlife site</p> <p>The land adjacent to the Grand Union Canal provides a rare undisturbed wildlife corridor approximately 0.5 km in length, supporting a variety of water birds including a kingfisher, herons and occasional egrets, and more common moorhens, ducks and swans. A full wildlife audit should be undertaken to ensure there is no damage to these animal habitats.</p> <p>With carefully built access routes this area could provide invaluable resources for school nature studies and wildlife observation.</p>
Include files	Patricia Wheway - DBC Rectory Farm FINAL DEC 2017 office version image.pdf
Number	Question 46
ID	LPIO22747
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Wayside farm is a 127 acre community farm, farmed by Charlie Wray since 1980. The farm is situated on the outskirts of Kings Langley village and separates the village from the M25 and A41</p> <p>The Green Belt amenities at Wayside Farm are irreplaceable:</p> <ul style="list-style-type: none"> • Wayside Farm offers a valued landscape to village residents • It has one of only two Jersey cow herds left in Hertfordshire, which yield high quality Raw Milk for local residents and visitors from around the M25 • It offers educational visits to local schools to learn about the processes of milk production and animal husbandry • It offers open fields and pathways within easy reach of Kings Langley for walkers, joggers and dog-owners to access. <p>Other issues</p> <p>Wayside farm has historical significance. The top of the farm near to Rudolph Steiner School was once the location of Queen Eleanor's 13th century Palace.</p> <ul style="list-style-type: none"> • Scheduled ancient monuments are located on Wayside farm between the A4251 and the canal and these need to be protected.

	<ul style="list-style-type: none"> • Under National Planning Policy Framework 2012 (NPPF) rights of way need to be protected. Wayside Farm has rights of way which are popular with ramblers, and dog walkers. These rights of way are not mentioned in the Dacorum Local Plan, which is misleading and could lead to a legal challenge. • Vehicle access from Wayside Farm during peak hours would be extremely difficult and time-consuming due to the considerable traffic tailbacks on the A41 and A4251 which already exist at peak times. • There is a lack of justification for building additional office space in Dacorum due to so many offices already being empty or not fully occupied as well as land designated for employment purposes on established commercial areas such as Maylands Avenue in Hemel Hempstead. So Wayside Farm should not be considered for office development • It should be noted that a large office building, Enterprise House, situated between Kings Langley station and M25, was recently converted to flats. There is not adequate demand for offices in Kings Langley village to warrant further office development.
Include files	
Number	Question 46
ID	LPIO22748
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>One the most significant objections to this particular development has to be traffic and road congestion.</p> <p>The site it in the North West corner of the village at the highest point from the High Street. It stretches along Love Lane from the cross roads to the edge of the Secondary school grounds and then runs parallel to Chipperfield Road houses right up the where it crosses the A41. So this will be at the bottom of the gardens of the houses along the Chipperfield Road and the edge of the school grounds.</p> <p>Chipperfield Road goes down to a cross roads with Love Lane and Langley Hill and then down one of three roads into Kings Langley village. These three roads are Langley Hill, Vicarage Land and Common Lane.</p> <p>Vicarage Lane is narrow with cars parked down one side. It gets very congested with traffic as only one car can go down or up the road at a time.</p> <p>Common Lane is also narrow and is where the Primary School is located, so this gets very busy at school drop</p>

off and pick up times, with cars queuing back some way to get into the village after school pick up.

Love Lane is the location of Kings Langley (Senior) School and in the morning and mid afternoon sees hundreds of children crossing the roads to make their way down to the village. This can be very dangerous with so much heavy traffic already around at that time.

Langley Hill is the location of the Rudolph Steiner School and so similarly in the morning and mid afternoon Langley Hill is extremely busy with traffic and children heading to school.

This is a huge problem daily as these roads are used by coaches and cars heading up from the High Street to one of the **three** schools – KL secondary, primary and Rudolph Steiner, which can only be reached from KL village by these roads. With over 2000 students at present, and potentially many more if any of the planned sites are developed, the volume of traffic is enormous. There is also significant risk of accidents to children crossing these roads to walk home.

In addition to school traffic, all traffic heading to/from Chipperfield - trucks, deliveries, bin lorries, emergency vehicles etc have to use one of the three roads up from the village then the single Chipperfield Road through.

There is currently no road access to the land on to Hill Farm. Very recently what was the access to the original barns etc has been developed to about 6 large barn conversion dwelling which now have security gated entrances .

Looking at the proposed plans there seems to be an access road running right through this newish housing area. This entrance would be within **yards** of the entrance to the secondary school and not far from the other two.

The plans state there is 'level access to the village centre' which is clearly not the case as this is the highest part of the village.

Include files	
Number	Question 46
ID	LPIO22749
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<u>Herts Ecology</u> Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present

	<p>within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h6: Land adj. to Blegberry Gardens, Shootersway</u> Ecology TBC. Further work will consequently be required to inform ecological impacts. Likely improved grassland if not arable as suggested and boundary features – scrub to SE. Adjacent to WS although this meadow habitat appears to have suffered significant natural succession. No obvious fundamental ecological constraint in respect of recognised value known within the site.</p>
Include files	
Number	Question 46
ID	LPIO22754
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h7: Land at Bank Mill Lane</u> Ecology TBC. Further work will consequently be required to inform ecological impacts. Locally significant river corridor meadows although recent intensive horse management most likely to have degraded any significant ecological interest. Requires appropriate surveys. No obvious fundamental ecological constraint</p>

	in respect of recognised value known within the site but loss of river corridor meadow habitat generally will be damaging. If developed, contribution to Biodiversity Offsetting should be sought and SANG given location. Local environmental enhancement would depend upon extent of site developed – 8m buffer each side of Bulbourne is essential.
Include files	
Number	Question 46
ID	LPIO22758
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as ‘biodiversity’ referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h8: Berkhamsted Golf Range, The Brickworks, Spring Garden Lane</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Possibly improved grassland but with substantial boundary features. No obvious fundamental ecological constraint in respect of recognised value known within the site. Local ancient woodland already degraded by motorsports activities but needs to be considered. Options for biodiversity / landscaping enhancements if not all site developed.</p>
Include files	
Number	Question 46
ID	LPIO22760
Full Name	Lewis Claridge
Company / Organisation	NHBE

Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as ‘biodiversity’ referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Tr-h1: Land to the north of Station Road</u></p> <p>Further work will be required to inform ecological impacts. Two WS adjacent and should be considered – increased isolation of grassland WS adj. Station Rd. All intensive arable but with significant network of associated hedgerows. No obvious fundamental ecological constraint in respect of recognised value known within the site. Contribution to SANGS should be pursued given location and extent of development. Loss of arable ecology may need offsetting contribution if shown to support associated fauna.</p>
Include files	
Number	Question 46
ID	LPIO22762
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p>

	<p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Tr-h2: Land west of Marshcroft Lane</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Improved grassland. No obvious fundamental ecological constraint in respect of recognised value known within the site. Contribution to SANGS should be pursued given location. Proposed ecological benefits of any significance unlikely given limited space available – but small enhancements may provide some measure of ecological benefit in comparison with existing habitat.</p>
Include files	
Number	Question 46
ID	LPIO22764
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Tr-h3: Land at Icknield Way / Grove Road (New Mill)</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Loss of significant area of largely improved grassland, possibly not wholly without ecological interest but no obvious fundamental ecological constraint in respect of recognised value known within</p>

	the site. Some boundary features of importance. Contribution to SANGS should be pursued given location and extent of development. Loss of extensive grassland ecology may require biodiversity offsetting.
Include files	
Number	Question 46
ID	LPIO22766
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Tr-h4: Land at Cow Lane / Station Road</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. No obvious fundamental ecological constraint in respect of recognised value known within the site. Largely semi-improved grassland with significant boundary features. Limited opportunity for ecological enhancement on site given size of site and development requirements – offsite potential offer should be considered. Some contribution to SANGS should be pursued given location.</p>
Include files	
Number	Question 46
ID	LPIO22768
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	

Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Tr-h5: Land at Dunsley Farm, London Road</u></p> <p>Further work will be required to inform ecological impacts. Largely grazed pasture with some arable; locally valuable hedgerow network. Western half improved grassland of limited ecological value providing no obvious fundamental ecological constraint in respect of recognised value. Eastern half includes a large grassland WS (also partly ridge and furrow) and adjacent to another pasture and orchard WS, the isolation of which should be avoided if this site was developed. WS grassland is a significant local constraint and must be fully considered and addressed as necessary. If this site is developed, biodiversity offsetting should be provided - loss of mixed farmland ecology also. Contribution to SANGS should also be pursued given location and extent of development. Two functional independent livestock farms to be lost.</p>
Include files	
Number	Question 46
ID	LPIO22770
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present</p>

	<p>within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Tr-h6: Land north of Icknield Way (Waterside Way)</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Previously relatively species poor agricultural grassland but now appears cropped. No obvious fundamental ecological constraint in respect of recognised value known within the site. Adjacent to canal and feeder stream which should be buffered and enhanced. Contribution to SANGS should be pursued given location and extent of development. Loss of agricultural ecology.</p>
Include files	
Number	Question 46
ID	LPIO22772
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Bov-h1: Land at Grange Farm, Green Lane, Bovingdon</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Adjacent to WS. Appears</p>

	grassland, likely species-poor. Valuable boundary features. No obvious fundamental ecological constraint in respect of recognised value known within the site. Reference to a Nature reserve erroneous – unless this refers to Brickworks WS. Contribution towards management of brickworks WS may be appropriate to accommodate additional pressure.
Include files	
Number	Question 46
ID	LPIO22774
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as ‘biodiversity’ referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Bov-h2: Land south east of Homefield</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Likely to be rank species-poor grassland with valuable boundary features. No obvious fundamental ecological constraint in respect of recognised value known within the site. Ecological enhancements welcomed but significant contributions likely to be limited given the extent of developed area.</p>
Include files	
Number	Question 46
ID	LPIO22776
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	

Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Bov-h3: Land r/o Green Lane / Louise Walk</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Likely to be species-poor grassland but significant boundary hedgerows. No obvious fundamental ecological constraint in respect of recognised value known within the site. Lack of public access is wholly irrelevant in respect of biodiversity - indeed a lack of disturbance is beneficial, although the location here is already urban fringe. Development will, by default, remove most if not all rural character. Proposed enhancements are welcomed but unlikely to compensate for the loss of grassland resource, although additional biodiversity offsetting is unlikely to be requested if the grassland is shown to be species-poor.</p>
Include files	
Number	Question 46
ID	LPIO22778
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present</p>

	<p>within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Bov-h4: Land at Duckhall Farm, Newhouse Road</u></p> <p>Ecology TBC. Further work will still be required to inform ecological impacts despite Phase 1 survey. Grassland known to be part of series of largely unimproved grasslands but those nearest farm may be less species-rich. Whilst there may be no fundamental ecological constraint in respect of recognised value known within the site, the ecological resource is still potentially locally valuable – the characteristic co-axial hedgerow network is highly likely to be very ancient, consistent with old farm previously unmodernised. If developed, biodiversity offsetting likely to be proposed. Potential to consider wider landscape management plan is fully supported and must be pursued to secure existing and potential biodiversity.</p>
Include files	
Number	Question 46
ID	LPIO22780
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as</p>

	<p>'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>KL-h1: Land at Hill Farm, Love Lane</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Site includes probably improved grassland, arable and former built area. Some boundary interest. No obvious fundamental ecological constraint in respect of recognised value known within the site. However would further isolate Kings Langley Common and possible loss of local farmland ecology. These issues would need to be addressed.</p>
Include files	
Number	Question 46
ID	LPIO22782
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>KL-h2: Land at Rectory Farm, Hempstead Road</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Important river corridor location which is also a WS. Rough grassland with scattered scrub, likely to be species poor but provides local ecological resource. No obvious fundamental ecological constraint in respect of recognised value known within the site. Ecological enhancement to river corridor would be sought – consistent with proposed landscaping associated with adjacent football club developments.</p>
Include files	

Number	Question 46
ID	LPIO22784
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>KL-h3: Land to the east of A41 and Wayside Farm, Watford Road</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Largely improved grassland and locally valuable hedgerow network. Eastern section adjacent to canal / Bulbourne corridor WS which should be enhanced but this section is historically valuable (SAM) and so precluded from development. Otherwise no obvious fundamental ecological constraint in respect of recognised value known within the site, but loss of extensive pasture may have associated farmland ecological interest which could require local offsetting. Loss of functional farm holding and grazing.</p>
Include files	
Number	Question 46
ID	LPIO22786
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	

Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>My-h1: Land south of Markyate</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Appears largely improved agricultural grassland, moderate boundary features and presence of upper reaches of River Ver albeit mostly dry. No obvious fundamental ecological constraint in respect of recognised value known within the site although local loss of any associated ecology may need to be considered and the river corridor feature enhanced – as suggested.</p> <p>-</p>
Include files	
Number	Question 46
ID	LPIO22788
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental</p>

	<p>designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>My-h2: Land at Pickford Road</u></p> <p>Further work will consequently be required to inform ecological impacts. The site includes a section of WS on common land along Pickford Rd and this would represent a significant local constraint and should not be developed, although the common land has been impacted by access roads elsewhere. Remainder of site appears largely rank, rough grassland with significant boundary features. This has the potential to have developed some local ecological value although this is unlikely to represent a fundamental ecological constraint in respect of recognised value. Any local ecology will need to be properly addressed accordingly.</p>
Include files	
Number	Question 46
ID	LPIO22790
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>O-h1: Land at Old Kiln Meadow, Water End Road, Potten End</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Appears largely heavily horse grazed grassland, may have some interest along with hedgerow, scattered trees, pond and semi-natural woodland with protected species at SE end of the site – which would represent a local constraint. If the site was to be developed and these lost, biodiversity offsetting should be sought. Otherwise no obvious</p>

	fundamental ecological constraint in respect of recognised value known within the site. A contribution to SANGS should also be pursued given location and proportionate to extent of development.
Include files	
Number	Question 46
ID	LPIO22792
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient</u> Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>O-h2: Land to the north east of Grange Road, Wilstone</u> Ecology TBC. Further work will consequently be required to inform ecological impacts. Likely to be improved agricultural grassland but with remnant ridge and furrow, with allotment and local hedgerow features, may be loss of associated ecology – some biodiversity offsetting may be appropriate. Retention of allotments proposed. Otherwise no obvious fundamental ecological constraint in respect of recognised value known within the site.</p>
Include files	
Number	Question 46
ID	LPIO22794
Full Name	Lewis Claridge
Company / Organisation	NHBE
Position	
Agent Name	
Company / Organisation	

Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p><u>Herts Ecology</u></p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS).</p> <p>Ancient semi-natural woodland is highlighted; why? <u>Ancient Woodland</u> is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p> <p><u>Be-h8: Berkhamsted Golf Range, The Brickworks, Spring Garden Lane</u></p> <p>Ecology TBC. Further work will consequently be required to inform ecological impacts. Possibly improved grassland but with substantial boundary features. No obvious fundamental ecological constraint in respect of recognised value known within the site. Local ancient woodland already degraded by motorsports activities but needs to be considered. Options for biodiversity / landscaping enhancements if not all site developed.</p>
Include files	
Number	Question 46
ID	LPIO22808
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<p>Brownfield site potential opportunities in South of Dacorum</p> <p>Hemel Hempstead:</p> <p>Maylands Avenue Hemel – including People Building and Lucas Aerospace site HP2</p> <p>Former Gasometer 353 London Rd Hemel HP3</p> <p>Link Road Hemel HP2</p> <p>Pennine Way Hemel HP2</p> <p>Former Buncefield Depot</p> <p>Three Cherry Trees Lane Hemel Industrial Estate HP2</p>

Druglink, Trefoil House, Red Lion Lane, HP3 9TE – large site but could be relocated. Adjacent Dacorum allotments . The allotments are covering 0.126 hectares could also be utilised to make the site more attractive.

Red Lion Pub, Red Lion Lane, 56 London Road HP1 3BD – pub on a large site running down to Grand Union Canal. Not a 'local' as not near shops or houses (apart from those at the bottom of Rucklers Lane). Part of the car park already 'leased' to County Council for their office workers.

DBC owned property 100 High Street, Hemel Hempstead, HP1 3AQ - vacant

167 London Road, Apsley, Hemel Hempstead, HP3 9SQ

Disused office owned by DBC - The premises is a single storey unit (with a net internal area of approximately 573 square feet)

DBC Garages 21 Bellgate, Hemel Hempstead, HP2 5SB – some vacant

DBC Garage 2 Kimps Way, Hemel Hempstead, HP3 8EN – some vacant

DBC garages are too small for using to park most modern cars

Kings Langley:

Pillings Volvo, 28 Rucklers Lane, WD4 8AU – large site already partially sub let as not financially viable.

Trade Link used cars, 20 Church Lane WD4 8JU – adjacent to Sunderlands Yard.

Trout Lake in Kings Langley is no long a public access lake.

Willow Edge complex and car park in The Nap/Blackwell road is being looked at.

Skyline Roofing, The Nap WD4 8ES has a builders yard at back which has previously been identified.

Chiswell Pools, 126 Hempstead Rd, WD4 8AL – leased. Has had previous application for 9 flats to be built on site.

DBC owned office at Charter Court, Kings Langley, WD4 9HR (adjacent Parish Council office – suitable as studio flat but VERY small)

Disused council garages between Waterside and Blackwell Road (south of footpath)

Disused council garages Great Park (north of Bechfield)

DBC garages in Barnes Rise WD4 8AN which have been receiving complaints as some of the leasees are using as businesses. Also significant fly-tipping which suggests they are mostly empty.

- 1 **NB.** Garages in Rucklers Lane have been identified for demolition and small housing development.

Tring:

DBC owned offices 7- 9 High Street, Tring, HP23 5AH - vacant

Chipperfield:

	<p>Chipperfield Garden Scene (garden centre), Chapel Croft, WD4 8EG – lease runs out next Summer and will not be renewed. Very large site, including huge non public space with commercial greenhouses.</p> <p>If we are looking at cross boundary sites (with Three Rivers) under the Duty of Cooperate then additional sites may be as follows:</p> <p>Three Rivers area:</p> <p>Possible opportunity for green field on lower Road -Nash Mills side of Red Lion Lane.</p> <p>Various light industrial units along Primrose Hill Kings Langley</p> <p>Alpine press, Station Rd, WD4 8LF – disused building adjacent to station.</p> <p>A T Olivers, Home Park Works, WD4 8LW – HUGE site</p>
Include files	
Number	Question 46
ID	LPIO22819
Full Name	Mr Patricia Wheway
Company / Organisation	
Position	
Agent Name	
Company / Organisation	
Position	
Your Opinion - Please state your opinion here	Yes
Your response - Please add your response here	<ul style="list-style-type: none"> • The consultation presents this site within Hemel Hempstead; however it lies within the parish boundary of Kings Langley. • This land has resisted planning applications in the past on grounds of breaching the Green Belt. These have to be held firm against the current plans as there is significant risk of merging Kings Langley with Apsley and Hemel Hempstead • Losing this land means it can never be reclaimed, and reduces the amount of recreational land available to an increasing population in DBC • Vehicle access would require a new road bridge over the West Coast Main Line to connect with A4251, and inevitably worsen congestion in London Road, which is extremely congested throughout the day. • Depending on the number of new homes, another new connection would be required in Rucklers Lane, part of which would then require to be widened • The County Archaeologist has identified a high risk that heritage assets with archaeological interest are present on the site, and archaeological assessment would be required. • It could impact the 18 hole golf course which is a well used local amenity • Under National Planning Policy Framework 2012 (NPPF) rights of way need to be protected. Shendish has rights of way which are not

mentioned in the Dacorum Local Plan which is misleading and could lead to a legal challenge.

- The land adjoining Shendish Manor is a popular location for ramblers, local dog walkers, and the young adventurers from Phasells Wood camp site.
- The land adjacent to the Shendish access road is farmland which has, for many years been used to graze cattle and provide grass for animal feed.
- The road access into Shendish Manor is restricted to a single road bridge which is not suitable for heavy traffic.

Environmental Issues

- There are a host of specimen trees which were planted many years ago as an overspill arboretum from Kew Gardens. All these trees make Shendish a place of environmental importance to the area, and the trees need to be preserved and protected.
- The effect on the water table at the bottom of Shendish. With any significant rainfall Shendish Lane can become a torrent of water and the impact this has on the surrounding roads and residents is very significant. There is already clear evidence of flooding issues in Apsley, following the development of the Manor Estate, where some retailers constantly suffer from flooding issues. Given the increased rainfall that has occurred in recent years, the risk of flooding is even higher now.
- Increased pollution and noise would have an adverse effect on health, wellbeing and air quality

Traffic Issues.

- The volume of traffic along the Hempstead/London Road has reached unsustainable levels. Over recent years Apsley has seen the development of the Sainsburys, Bunnings, Wicks and Dunhelm Retail outlets which has drawn huge volumes of shopping traffic into the area.
- There have been housing developments on the Apsley Paper Mill sites, the Nash Mills sites and the Manor Estates plus several other local developments totaling over 2500 houses. All these developments have contributed to huge traffic congestion into the Kings Langley area.
- We have a significant amount of traffic generated by the County Council Offices in Apsley 1 and Apsley 2 office blocks, and also from the Westside Office complex, where on the 18th November over 800 cars were parked in their car parks., The entry point roundabout, where all these vehicles access and exit these sites, is within 50 metres of the access road into Shendish. The proposal to add up to 900 dwellings on to the Shendish site can only add significantly to the existing traffic congestion.

Examples of the type of congestion Shendish residents face

- Driving to the M25 from Shendish can regularly take more than 20-30 minutes from 7 to 9.30am. People from Hemel and the surrounding

	<p>district use the roads through Kings Langley to avoid the A41 to join the M25 junction</p> <ul style="list-style-type: none"> • The London/Hempstead Road becomes totally log jammed, morning and evening each day, with traffic entering and leaving the Westside and County Council offices. Journey times can be increased by up to 20-30 minutes because of this congestion. • The whole area can become grid locked when there is an accident on the M1, M25, or the A41. • Rucklers Lane is in some places just a single track lane, particularly at the Red Lion junction. It is wholly unsuited to any additional housing traffic if access were to be made from Shendish.
Include files	
Number	Question 46
ID	LPIO22832
Full Name	Wayne Church
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 express my extreme concerns over the proposed development of Bovingdon village. Whilst I understand the need to provide additional housing Bovingdon is not able to sustain that amount of development, no matter which site may be accepted.</p> <p>Having lived in the village for 35 years I have seen it grow relatively organically but the effect on the high street has been dramatic with congestion now a real problem. There have been some discussions about pedestrianising the high street but this would only make Green Lane a drag strip and would, without doubt, lead to the death of a villager, and I'm not being dramatic. Even if traffic calming measures were introduced the lane would effectively become a highway!</p> <p>It is a privilege to live in a village where community still has a true meaning. However, that notion is overshadowed by the simple fact that the infrastructure is not there even before any further development. You will no doubt be aware that Bovingdon has for many years had severe issues accommodating secondary school children. In the past Hemel Hempstead school was available but that was removed. Kings Langley, my old school, was then offered but that has now gone. Ashlyns is the current school offered and my nephew has just started there but I suspect that it too will be oversubscribed due to the recent huge development near Shooters Way.</p> <p>Environmentally there is the obvious loss of green belt but more worrying is the effect of losing a natural flood plain and adding to the problems that already exist. I'm</p>

	<p>sure everyone remembers Bovingdon under water after flash flooding last year!</p> <p>My wife wrote to the planning department 3 years ago when other proposals were made and we were advised that if the village supported the additional 60 homes proposed at the prison estate there would be no further requirements to develop. The thin end of the wedge maybe?</p> <p>As a planning office I would urge you to plan for the good of everyone. Why can't a whole new village be created near good transport links that would take the pressure off of, not only Bovingdon, but Kings Langley and other lovely villages.</p>
Include files	
Number	Question 46
ID	LPIO22834
Full Name	Paul McAuliffe
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 object to your proposals to build new homes in Kings Langley and Bovingdon.</p> <p>I moved to this part of Hertfordshire in 2002 from North West London because of the ever growing population in the area. It seems that this is what you are planning in this area. Where are they going to shop, go to the doctors, send their children to school? We have limited hospital provision in the area. The roads are clogged both in Kings Langley and Bovingdon.</p>
Include files	
Number	Question 46
ID	LPIO22835
Full Name	Paul McAuliffe
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 object to your proposals to build new homes in Kings Langley and Bovingdon.</p> <p>I moved to this part of Hertfordshire in 2002 from North West London because of the ever growing population in the area. It seems that this is what you are planning in this area. Where are they going to shop, go to the doctors, send their children to school? We have limited</p>

	hospital provision in the area. The roads are clogged both in Kings Langley and Bovingdon. Only last week a lady was knocked down in Bovingdon High street, and you want to add to the misery.
Include files	
Number	Question 46
ID	LPIO22836
Full Name	Kim Church
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 express my deep concern regarding the recently published proposals for the village of Bovingdon.</p> <p>Having been a resident in the village for over 25 years I feel very strongly that the proposed number of houses planned for the village will strip this community of its identity, and cause many more problems than it will solve.</p> <p>Bovingdon is a village that already has its problems with severe traffic congestion, a village centre which is impossible to travel through and a lack of school places for residents. The children of Bovingdon village have historically been shifted from Hemel Hempstead secondary school to Kings Langley and now Ashylns as the population surrounding these schools grows and Bovingdon is then too far away to gain admittance. Where to next?</p> <p>The proposed sights of these developments will cause horrendous problems with the increase of traffic & parking of cars on the surrounding roads. Green Lane is already a rat race, and the sheer number of cars trying to access Green Lane from either Homefield or Louise walk into the village or the Chipperfield Road will create black spots and ultimately accidents will occur.</p> <p>Has anyone from the council actually bothered ever trying to turn out of Homefield onto Green Lane, especially during morning & evening rush hour and weekends. I suspect not as it would be clearly apparent that visibility is poor and you are unable to see the traffic approaching up Green Lane. Can you imagine 160 houses with at least 1 car per house, and more likely 2/3 per house and the sheer volume of potential problems this will cause. I clearly believe it will be a matter of time before a serious accident occurs, potentially killing someone.</p> <p>I find it ludicrous that the council document actually makes mention to the fact that the development from Homefield would not have an impact on traffic congestion due to its closeness to the village and the fact that people would walk to the village from this site. Where do the</p>

	<p>council actually believe that people go shopping, to work, and the children to school. ?</p> <p>I find it deeply distressing that town planners take no consideration to the current residents of this village, and want to destroy communities without any for thought to the impact of the lives of actual people who live in the village.</p> <p>We as residents can not allow this to happen.</p>
Include files	
Number	Question 46
ID	LPIO22837
Full Name	K.A Chowdhury
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 register my objection to any de-classification of land surrounding Shendish Manor and Shendish Golf Course for development.</p> <p>My objection is based on:</p> <ol style="list-style-type: none"> 1 Some land around Shendish Manor House was allowed to be developed in earlier years 2 Land adjacent to the Cocks Head Wood was also allowed to be developed in recent years 3 Some 900 houses have been built already on point 2 4 These developments have put extra pressure on Road A41 that goes from Kings Langley High street to Hemel Hempstead via Apsley High Street. There is often bottle neck and bumper-to-bumper traffic. Any further development will seriously worsen the road traffic condition. 5 No further land should be released from Green Belt at Shendish Hill. <p>In view of the above, I strongly object to releasing any land surrounding Shendish Manor and Shendish Golf Course from Green Belt restriction for development purpose.</p>
Include files	
Number	Question 46
ID	LPIO22838
Full Name	Alison Banister
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 read the suggestions for building more houses in Bovingdon. Whilst I understand the need for building more council & private housing, how on earth will the already full village school & doctors surgeries & dental surgeries cope? Also the traffic congestion in the village centre is appalling. Bovingdon needs a bypass & a car park plus a traffic warden to prevent dangerous parking.
Include files	