



## **Chiltern Society Response to the Dacorum Emerging Strategy for Growth (2020 - 2038)**

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### **Overall Approach**

The Chiltern Society is an environmental charity with 7000 members, which seeks to protect the landscape and biodiversity of the Chilterns, including the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Part of the Society's remit is to input to the planning system in relation to planning policy and local planning applications. This response has been prepared by the Society's Planning Officer with detailed input from our Planning Field Officers working in Dacorum Borough.

We have been working with other local organisations in an alliance called 'One Voice' to agree a shared approach to opposing the Dacorum Local Plan. We have agreed, and now endorse, the following 3 statements in relation to the Emerging Strategy for Growth as a whole -

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

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

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

## **Dacorum Local Plan – Questions**

### **Question 1: Do you think the overarching vision, the vision for Dacorum's places and the strategic objectives are right for the Borough?**

The Society held an online consultation event on 14<sup>th</sup> January 2021 to gauge the views of members and other partner organisations concerning the Local Plan. There was a broad consensus that the Plan was not a suitable Plan to steer the future of Dacorum as it proposed too much development and insufficient environmental safeguards.

We would like to make some general comments here, as well as specific comments on sections of the Plan.

#### **General Comments**

The Society objects to the strategy proposed in the Plan as it proposes an excessive number of new houses across the Borough and presents a significant threat to the Green Belt and the setting of the Chilterns AONB.

The issuing of the Plan is totally premature given the current health crisis, giving rise to limited public consultation. Previous Plans involved public exhibitions and leaflet drops to ALL households in the Borough. This consultation relies on the internet. Not every household has access to the internet which disenfranchises a large section of the population which is clearly undemocratic.

DBC gives little consideration to the effect of this massive amount of development on the existing settlements which will suffer from increase in traffic, loss of open space and pressure on facilities. Infrastructure within the Borough (eg roads, education, health care etc.) is already under considerable pressure from the existing population and increasing it by around 30% will put further excessive pressure on these. Whilst developers may be required to contribute towards infrastructure, this may not be sufficient to meet the needs of this vastly increased population and concentrates benefits on the new developments. It's all about development with little attention paid to its effects and little on mitigating the damage.

There are already outside pressures on the infrastructure such as the proposed expansion of Luton and Heathrow airports with the consequential increase in traffic, noise, pollution, the loss of Hemel Hospital with Watford being difficult to access at times and struggling to cope at present (even pre Covid), massive expansion of Aylesbury which will impact on availability of facilities, especially health and education, for those in the west of the Borough and the expansion of St Albans with possible development adjacent to Dacorum's boundary.

It is also dependent on the release of vast tracts of Green Belt land. The three main towns in the Borough are surrounded by Green Belt the loss of which will be detrimental to not only the residents of the towns but by others working and visiting the area. The reason people want to live in Dacorum is not just its proximity to London and its facilities, but because of its setting in the countryside.

We recognise that development, especially housing, is needed. However, the current plan proposes 15,658 additional dwellings based on flawed and outdated calculations of housing need. The Government is currently revisiting the numbers and distribution of housing numbers and therefore the Plan should be suspended until such decisions are made. As submitted the Plan is NOT SOUND. The Council appears to be intent on providing at least 100% of their self-assessed figures regardless of the impact. Revised figures

may have a material impact on the requirements for the Borough requiring less development and consequently the release of large tracts of Green Belt can be avoided. The Council should be arguing against these numbers and not just 'roll over' and accept them. This may not be what the Council wants to do as it may fear the loss of substantial income!

There are 59,938 households in the borough at present, with 16,899 new ones planned in just 17 years. That's a 28% increase in a Borough that is highly constrained by Green Belt and AONB. It is unclear from the Plan whether the Council will be taking into account the recent Government announcements to revise their housing targets, preferably downwards, to protect rural areas in the south east, as reported by the BBC on 16<sup>th</sup> December 2020. Initial indications that we are getting are that the number may actually increase further. This goes against Government announcements about 'levelling up' and encouraging more development in cities in the north of England. This does not make any sense in a Borough as constrained as Dacorum.

Looking at the population statistics of 155000, an increase of nearly 52000 based on 17500 new dwellings means a population uplift of around 30%. Most of this build will be on green belt and in close proximity to the Chilterns AONB.

There is already substantial build agreed and with the proposed numbers the Borough will become urban rather than rural in nature. As most of this new build is on Green Belt, any requirement to replace Green Belt will use up the rural area and maybe the AONB.

The Plan is outdated in approach and assessment. It should start with an integrated approach including climate change, biodiversity, protection of the environment and the well-being of existing and new residents. This Plan prioritises economic growth and greenfield development at all costs.

Covid-19 has changed the face of how we work, shop, play and travel. Have those responsible for the plan thought how they will take this into account, and when they will amend these plans accordingly? Because of COVID-19 the AONB has seen a sharp rise in visits by people seeking open space and outdoor amenity, and colleagues have heard complaints from friends and neighbours trying to access both Ashridge and Wendover Woods about the sheer volume of cars and people making it impossible to visit and park.

Access to open land is clearly a health issue. The Government and the Mayor of London publicly support the protection of the Green Belt, described as 'London's lung'. The current health crisis has emphasised the importance of open space for health and recreation. The popularity of the area has been seen in recent months with the influx of visitors seeking fresh air and recreation during the pandemic. Given more normal times this would have been a boost for the local economy and will do so again when other facilities become available again. This income will be lost with the land developed. The beautiful, green and tranquil open landscape with its historic field patterns and ancient woodlands cannot be adequately replaced by the so called 'Suitable Alternative Natural Greenspaces' (SANGS) ie. manufactured open space. Why build on natural open space merely to replace some (only very limited) man-made green space. The wildlife will disappear as their habitat is destroyed.

Due to the pandemic, the collapse of the retail sector, and the new situation of many people working from home, there will be a glut of commercial properties which can be converted into residences. This is already being planned by John Lewis.

The devastation of the Green Belt around Tring, Berkhamsted and Hemel Hempstead, abutting the Chilterns Area of Outstanding Natural Beauty (AONB), is significant, in reality it is unclear what the Council will do to mitigate this. Regardless of previous actions the region's biodiversity has suffered as much if not more than any other non-metropolitan region of the UK, and indeed possibly the whole of Western Europe.

The Green Belt around the three main towns currently fulfils the 5 functions of the Green Belt. These functions have not become unnecessary and the general presumption against development in the Green Belt as set out in the NPPF is still relevant. The Council has ignored para 11 (6) which allows local authorities to restrict the scale of development due to other planning constraints including impact on the Green Belt and AONB. No exceptional circumstances have been demonstrated to justify such a vast loss - their desire to meet their calculation of housing numbers is NOT an exceptional circumstance.

One third of the countryside area in Dacorum is Chilterns AONB - surely a lot more emphasis must be made on its importance and protection. No mention is made of the possibility of the CAONB becoming a National Park - has Dacorum heard of the Glover Report or the Government's 'Ten Point Plan for a Green Industrial Revolution', which include the creation of new National Parks? Again, an indication of a poor Plan!

As well as the obvious environmental impact, there will be physical and visual impacts on the AONB. Once the additional local residents and their vehicles are added to this then there will be serious management issues for the AONB, which as we are well aware is not a National Park, although the Chiltern Society hopes that designation may happen in future. What guarantees can the Council and government give that this unique landscape will be protected and maintained for the future?

Most of the build will be to the north and east of Hemel Hempstead (11688), Berkhamsted (2230) and Tring (2730). Most of the areas are in Green Belt and close to the AONB, and the impact on these towns needs to be considered. Little recognition seems to have been taken of the topography, we are basically talking about a series of valleys and therefore any development on the slopes is going to have a visual impact for many miles.

We note that the Government's February 2021 consultation on changes to the National Planning Policy Framework is proposing to add a specific reference to the impact on the settings of AONBs into the existing AONB paragraph 172.

The landscape and visual impact of the proposed housing developments is likely to be significant around the urban areas of Hemel Hempstead, Berkhamsted and Tring.

A new link road is proposed east to west in north Hemel, so traffic issues and noise, visual impact etc. are inevitable.

The whole character of the Borough will be changed, the small market town of Tring is expected to absorb what is a 20% increase in residents, bolting a new "village" onto it.

Berkhamsted is a historic and larger market town with a proposed increase of around 30% on top of the big Bearroc phase 1 and 2 developments generating over 200 new houses, and already creating traffic issues along Durrants Lane and Shootersway. A 2 bed semi costs in excess of £450k, hardly affordable housing. This has become a very desirable commuter town over the last few years, but will this still be the case after Covid with numbers moving out of London and a lot less commuting/more home working? What effect will all this have?

Whilst there are commendable targets for the Council to be carbon neutral by 2030 (not the region, just the Council), and an aim for a biodiversity net gain of 10%, we are not convinced the Plan would do enough to combat either Climate Change or Biodiversity loss.

We would like to see the Council supporting the Society's Manifesto for Chilterns Wildlife ( <https://chilternsociety.org.uk/chiltern-manifesto/> ) and proposals for a 'Wild Belt' in the Tring and Wendover area to support this. If development is to be allowed, then strategic biodiversity enhancements and net gain must be incorporated and managed in the long term.

We are already exceeding the environmental boundaries our region can cope with and see nothing real in this plan to change that. We need to know what is being done differently to ensure a real biodiversity net gain, and to combat climate change other than the 'business as normal' plan that this appears to be. The time to act on this is now.

### Specific Comments

**2.1 - Opportunities and Challenges for Growth** – This needs to include a reference to habitat loss and making a significant contribution to habitat recovery.

**2.2 - Climate Change Emergency** – The Council needs to commit to improving the resilience of the local environment to climate change.

**2.19 – 2.20** - The Natural Environment section needs to stress the national importance of the Chilterns, including it potentially being designated as a National Park following the Glover Review 2019.

The Plan should also commit to a step change in the restoration, enhancement and creation of wildlife habitats across the Borough to reverse biodiversity decline, whilst ensuring the local environment is resilient to climate change.

The loss of agricultural land is particularly relevant given that having left the EU the government is promoting home grown food. The excessive loss of large tracts of good quality agricultural land is contrary to this aim.

There is no indication how it is intended to reduce local carbon emissions in order to meet the national climate obligations of zero by 2050. Planting a few trees is not enough.

The Plan treats the three main towns in the same way - just build around the edges. This takes development further away from facilities further exacerbating the use of cars which undermines sustainability and the effect on climate change. No regard is taken of the topography of Hemel Hempstead and Berkhamsted lying within the valley floors. Thus, any development at the edges is on the ridges and not only will this have severe visual impact on the surrounding countryside which is within the CAONB but makes journeys to the facilities more difficult and does not encourage walking/cycling.

**2.24** – This section needs to include a clear statement about protection of the Green Belt and the Chilterns AONB. Commitment to protect the wider countryside 'as far as possible' does not give this matter the priority it deserves. Habitat loss across the country has been accelerating in recent years and the Council must commit to work with local and national environmental organisations to set some ambitious targets for large scale improvements and not overseeing a managed decline over the plan period.

Whilst the proposed developments are not actually in the CAONB, the effect of them will have a devastating effect on the CAONB. The Green Belt and the AONB are intrinsically interwoven, thus diminishing the Green Belt which diminishes the AONB. The introduction of significant and abrupt changes to landscape character (especially where the land is currently of similar character to the AONB) will be detrimental to the whole landscape character, loss of biodiversity, impacts on character and appearance of rural roads and lanes, increase in air and water pollution and of course a detrimental effect on the existing settlements and inhabitants. Very large developments like those proposed will have an impact even if they are some distance from the actual AONB boundary. There will be severe effects on views out of the AONB and views of the AONB. There will be a loss of tranquillity from lighting, noise, traffic movements.

**3.3** – The six over-arching themes need to sound much more ambitious. In particular Theme 4 lacks any ambition to make real improvements to the landscapes and biodiversity of the Borough. Clean, green and attractive areas are important, but there should be an ambition to encourage landscape-scale conservation and reconnect wildlife habitats across the Borough and linking into adjacent districts.

**Overarching Vision** – The Chiltern Society is disappointed with this vision. It appears to advocate ‘more of the same’ rather than setting out a new vision for the area. With significant changes to priorities and attitudes arising as a result of Covid-19, climate change, biodiversity loss and sustainable transport, there is a need for a much more ambitious vision. The proposed level of housing is excessive, in our opinion, but if it is to go ahead the Plan needs to include equally ambitious proposals in these other key areas. There need to be specific strong commitments to maintaining and enhancing the Green Belt and the Chilterns AONB (or National Park) in the long term to maximise their benefits to the local environment and enhancing people’s lives. It is not acceptable to simply allow major housing development and create urban green space to compensate for the loss of open countryside. The Plan must maximise biodiversity net gain and should consider Nature Recovery Networks to act as focal points for significant wildlife enhancements.

In relation to the Chilterns Beechwoods SAC, no impact should be permitted as a result of new development. It is not acceptable to allow impacts and then seek to mitigate them. The vision needs to be more definitive and not take an ‘as far as possible’ approach to protecting the local environment.

**The Vision for Dacorum’s Places** – As for the overarching vision, these sections could be presented in a more inspiring way. They come across as a ‘business as usual’ list of aspirations without presenting any significant changes of approach. It would be clearer to have a succinct vision statement for each settlement, which could then be supported by a number of bullet points. It is essential that the reader can gain an immediate idea of the long-term vision for each settlement without necessarily having to read through all the bullet points.

Each of the local visions need to include clear aspirations for protecting and enhancing the local environment, including designated landscapes and significant biodiversity net gain, including nature recovery networks. It is not sufficient to ‘take into account’ sensitive views, landscapes and protected environmental sites. These need to be protected and enhanced through the creation of buffer zones and establishing habitat links between isolated wildlife sites. It needs to be a positive vision for the future.

**Strategic Objectives** – We support the proposed objectives for Conserving and Protecting the Natural Environment. The Council could, however, go further, as suggested above, and take a more proactive approach to habitats creation and enhancement. The Society’s Manifesto for Chilterns Wildlife seeks to take a strategic approach across the Chilterns and could be incorporated into the objectives for the Local Plan. <https://chilternsociety.org.uk/chiltern-manifesto/> The conservation of the internationally important chalk streams, woodlands and grasslands are key parts of this.

## **Question 2: Do you have specific comments about the Sustainable Development Strategy?**

**5.2** – This paragraph includes a bullet point about minimising and managing development on Green Belt land. It needs to be clear whether this relates to the existing area of Green Belt or the remaining areas of Green Belt once the site allocations are removed. Either way the strategy must include an objective to reduce land removed from the Green Belt to an absolute minimum and exceptional circumstances must be clearly demonstrated.

**5.3 – 5.5** – The Society supports proposals to increase density and heights in urban areas to reduce impacts on the wider countryside. This could include significant developments of flats and starter homes, which require less land take, to reduce the need to expand Hemel Hempstead, Berkhamsted and Tring into the Green Belt. Careful assessment would need to be undertaken in each settlement in relation to building heights. For example, Berkhamsted does not generally have buildings over 3 storeys and increasing that height could harm the character of the settlement.

We would advocate the approach similar to that set out in the Chesham Masterplan which encourages housing development in sustainable locations in the town centre whilst reducing the need for car travel. This can be viewed on the following link <https://cheshammasterplan.org/> This approach could be adapted to make it suitable for Tring and Berkhamsted. In the light of Covid-19 the strategy will need to consider whether there is scope for new uses of town centre buildings arising due to more people working from home and retail businesses closing.

**Policy SP2** – The proposed housing target of 16,596 (922 per annum) is excessively high and, in particular, the increases in housing at Tring and Berkhamsted would have significant impacts on the character of those towns, as well as destroying significant areas of Green Belt. In view of the proposed changes to the planning system and the methodology for assessing housing needs, the Council must seek to reduce these numbers. This would be consistent with the Government's 'levelling up' agenda, reducing housing in the south east and increasing housing in the north. In a borough with the majority of the area designated as Green Belt or AONB there must be scope to reduce the housing numbers. The Government has yet to publicise how the methodology could be amended to allow for this. As it stands, the Borough has a higher housing target than some of the cities in the north. In an area with national designations and aspirations to become a National Park, this cannot be acceptable.

Bullet point 1d seeks to create additional retail floorspace. At the present time, the long-term impacts of Covid-19 on the retail industry are unclear, but with online shopping increasing further units may not be required. We suggest this is reviewed at the next stage in the plan process and some of the sites could potentially be considered for housing in the urban areas.

**7.5 – 7.6** – The annual target of 922 homes is excessively high when compared to the 433 required in the previous Local Plan. In such a highly constrained district, this increase is not achievable without significant loss to the Green Belt and open space in and around the towns. This number must be reviewed when the Government decides how to take forward its proposed planning reforms. If the numbers can be significantly reduced, then most of the proposed Green Belt sites could be taken out of the Plan and housing development more concentrated within the urban areas. If the Green Belt sites are not required to meet reduced housing numbers, then exceptional circumstances would be unlikely to exist to remove land from the Green Belt. We would expect this issue to be addressed in detail in drawing up the next version of the Local Plan.

### **Question 3: Do you have specific comments about any of the Guiding Development policies?**

**Policy DM19 - Mix of uses in Town, District and Local Centres Policy** – Given the impacts of Covid-19 on retail and other businesses, more emphasis needs to be put on the reuse and conversion of disused properties to help to meet the housing need in sustainable town centre locations.

**Policy SP10 - Climate Change Mitigation and Adaptation** – The Chiltern Society supports the proposals for climate change mitigation and adaptation. To meet the 2030 target there will need to be a step change in the way new developments address climate change. Habitat improvements should not be restricted to tree planting schemes and should involve the creation and restoration of a range of different habitats, concentrating on those that are typical of the local area and suitable for local soils. Proposals should link closely with requirements for biodiversity net gain from developments and, where possible, with other more strategic initiatives in the local area such as Nature Recovery Networks and the Environmental Land Management Scheme (ELMS). Within the Chilterns, this should link to the actions set out in the Chilterns AONB Management Plan (Chilterns Conservation Board) and the Chiltern Society's Manifesto for Chilterns Wildlife. The emphasis should be on on-site mitigation, but there is also scope for a carbon off-set fund as referred to in the policy.

**Policy DM25 - Stand-alone renewable or low carbon energy** - The Society is concerned over potential landscape and visual impacts on the Chilterns AONB. As a general rule, any installations should be located adjacent to existing clusters of buildings and should be located below the skyline wherever possible. There needs to be more emphasis on the devastating effect large wind turbines and solar farms have on the landscape and especially on the CAONB.

**Policy DM26 - Carbon Offsetting** - Any carbon offsetting that involves tree planting or habitat creation needs to be co-ordinated across the Borough to prioritise the type of habitats required through a Nature Recovery Network, Local Nature Recovery Strategy or the Hertfordshire Biodiversity Action Plan. We need considerable swathes of tree planting/habitat creation and not just 'token corridors'.

**Policy DM27 - Landscape Character and Chilterns Area of Outstanding Natural Beauty** - The Society fully supports this policy. The supporting text should refer to the Chilterns potentially being designated as a National Park during the plan period.

**Policy DM28 - Protection of Sites** - The Society supports this policy.

**Policy DM29 - Protected Species and Priority Species and Habitats Policy** - The Society supports this policy.

**Policy DM30 - Biodiversity Net Gain** - We support this policy, but there needs to be a clear targeting strategy to ensure it creates the right habitats in the right places and establishes wildlife corridors and networks between sites.

**Policy DM31 – Chilterns Beechwoods Special Area of Conservation** - The Society supports this policy. The Chilterns Beechwoods Special Area of Conservation (CBSAC) is a site of European importance for biodiversity and wildlife conservation. Again, the Plan is premature and unsound in that Dacorum has not fully considered the adverse effects on the CBSAC. Dacorum is being irresponsible for publishing the Local Plan without this assessment.

**Policy DM32 - Development on the Ashridge Estate** - The Society supports this policy.

**Policy DM33 - Protection and Enhancement of the River Character and Water Environment** - The Society welcomes the recognition of the importance of the chalk streams. The policy could go further in seeking to restore flows and improve the water quality and ecological conditions along these watercourses. Many of the sites proposed for allocation in the Plan, particularly around Hemel Hempstead and Berkhamsted, are likely to put unacceptable increased pressure on water resources in particular and contradict the aims of this policy. Water supply is a problem across the Borough, and abstraction from the chalk streams is supposed to be being curtailed, where would this extra supply come from? New water supplies and massive investment in infrastructure is required for the whole area which cannot be provided by Dacorum and relies on other bodies. There is no indication as to if and when this will be carried out and therefore the Plan is premature.

**Policy DM36 - Tree Retention and Protection** - The Society supports this policy.

**Policy DM37 - Landscaping on Development Sites** - The Society supports this policy. However, the policy and supporting text should recognise the threat of ash dieback and seek to encourage replacement planting of other species suitable to the locality. This needs robust planting and enforcement of it and the species must be appropriate. However, tree planting alone is not enough - detailed landscaping schemes with structural planting on development sites must be provided.

**Policy DM38 - Open Land** - The Society supports this policy.

**Policy SP11 - Development in the Green Belt** – The Plan needs to be much more explicit as to how the Council has demonstrated ‘exceptional circumstances’ for removing land from the Green Belt to allow for development. One of the main purposes of the Green Belt is to prevent urban areas expanding into the open countryside. This Plan has all the main urban areas expanding into open countryside. The need for additional housing does not on its own create an exceptional circumstance for allowing development in the Green Belt. The fact that the areas adjacent to settlements provide green space and a quality environment for local residents should weigh heavily against changing the Green Belt boundaries. Most are within the setting of the Chilterns AONB. National housing targets are very unclear at the moment, and boroughs such as Dacorum should be expected to provide less housing than more built up and less protected areas elsewhere in the region and nationally. These figures and the proposed sites must be reviewed when the methodology for assessing housing numbers has been revised.

**Policy SP12 - Development in the Rural Area** - The Society supports this policy.

**Policy SP13 - Delivering High Quality Design** - The Society supports this policy.

**Policy DM41 - Height of Buildings** – The Society supports this policy as it provides a method for meeting more of the housing need within sustainable locations in urban areas, thus helping to reduce the need for development in the Green Belt and/or AONB. Taller buildings provide opportunities for more dense development, including more affordable and starter homes, which are desperately needed in the Borough. However, there is a need to safeguard the setting of listed buildings and historic sites from high buildings.

**Policy DM43 - Historic Environment** - The Society supports this policy.

**Policy DM44 - Development Affecting Non-Designated Heritage Assets** – The Society would like to see this policy make more reference to the importance of historic landscapes. With a long history of habitation, the Chilterns contains many landscapes which should be considered of historic importance.

**Policy DM46 - Conservation Areas** - The Society supports this policy.

**Policy DM47 - Listed Buildings** - The Society supports this policy.

**Policy DM50 - Transport and Movement** – This policy should include a reference to the strategy being prepared by England’s Economic Heartland for the surrounding region. That is seeking to develop alternatives to road transport, incorporating the digital economy. Covid-19 has also changed working patterns, with many more people working from home and the need for travel greatly reduced. This change is unlikely to be reversed and should be recognised in the Plan.

**Policy DM52 - Movement and access** – Again, this seems to be based on the assumption that people will continue to move around to the same extent. The policy needs to consider potential future scenarios relating to travel needs for work and leisure. A separate policy could be added to encourage and support home working to reduce the need to travel.

**Policy DM53 - Walking and cycling** - The Society supports this policy.

**Policy DM59 - Health Facilities** - The ongoing arguments about hospital availability has been resolved only by a proposed rebuild of Watford General. Trying to get to Watford quickly is impossible, and how much worse would it be when dealing with these additional numbers?

Doctors' surgeries are under pressure in Berkhamsted, numbers increasing in the remaining 2 as 2 have closed, with no new premises. Two doctors' surgeries in Berkhamsted have amalgamated into one at different premises which provide only 6 patient car parking spaces. This illustrates the space issue, especially as this "new" surgery is being billed as the one to take all the new build residents as well as its existing numbers, a plus of some 660 residences including the 200 Bearroc homes. New infrastructure should be provided at the same time as any new build housing, as an integral part of the planning overall.

**Policy DM61 – Education** - The Local Plan acknowledges a lack of school places and there are proposals for new secondary and primary schools, Ashlyns in Berkhamsted is full, and it is unclear how quickly they can be built. Rush hour when the schools are open puts pressure on our roads which are becoming ever busier, and parking in the towns is often roadside and on pavements due to lack of parking spaces and 2/3 car households.

Whilst there is a severe shortage of school places due to the massive increase in dwellings without requiring school provision, exacerbated by County policy of building houses on school sites. Who knew that demolishing a school, building family homes on the site and then finding that there were children needing to go to school where there was no school!

#### **Question 4: Do you have specific comments about any of the Delivery Strategies?**

##### **Hemel Hempstead**

Here are our initial thoughts on the Delivery Strategy -

- How can the loss of a significant area of open countryside be justified?
- Development would be right up against the AONB boundary.
- Much of the North Site is on raised ground and will be visible from the surrounding area, much of which is AONB (possibly soon to be NP)
- What are the exceptional circumstances to justify the removal of vast areas from the Green Belt?
- The openness of the Green Belt is a critical feature of all the sites.
- Contrary to purposes of the Green Belt – encroachment into open countryside.
- Some development close to the town edge might be possible although some distance from town centre and facilities and could be deemed unsustainable.
- Has development in the town centre / existing urban area been maximised?
- The additional water usage would be likely to have a detrimental impact on flows in the River Gade, which is one of the Chilterns' internationally important chalk streams.
- The West of Hemel site (LA3) already has planning permission and Marchmont Farm has been accepted under the previous Plan and an application is imminent.
- No account has been taken of the impact of the withdrawal of the St Albans Local Plan which the Inspector advised would not be found 'sound'. This has major implications for the much heralded 'Hemel Garden Communities' project ie 5500 dwellings north of Hemel Hempstead - another indication of the Plan being poorly thought out, unjustified and premature.

##### **Berkhamsted**

Here are our initial thoughts on the Delivery Strategy -

- Loss of a significant area of open countryside – can this be justified?
- Takes up almost every field to the south and west of Berkhamsted - will have a significant impact on the character of the settlement. No longer a patchwork of open fields and developed areas.
- Are there exceptional circumstances to remove the sites from the Green Belt?
- The openness of the Green Belt is a critical feature of all the sites.
- Contrary to purposes of the Green Belt – encroachment into open countryside.
- Loss of open space for recreation
- A Masterplan will be critical.
- Views to and from the AONB would be impacted to the south onto Darrs Lane and the south/west side of the valley from Berkhamsted and Northchurch Commons, and Shootersway to the AONB south of town.
- Will increase the housing numbers in Berkhamsted by 31% - this is too much.
- Some development close to town edge might be possible although some distance from town centre and facilities and could be deemed unsustainable given the steep valley sides.
- What justification is there for such a large increase in this historic town?
- Has development in the town centre / existing urban area been maximised?
- The additional water usage would be likely to have a detrimental impact on flows in the River Bulbourne, which is one of the Chilterns' internationally important chalk streams.
- Public transport is very limited, buses do not serve Shootersway or the other areas of development along Darrs Lane and it is confined to the High Street, and the station is nearly 2 miles up/down hill from most of the build. Hence there will be a huge increase in private vehicular movements.

## Tring

Here are our initial thoughts on the Delivery Strategy -

- Loss of a significant area of open countryside – can this be justified?
- Are there exceptional circumstances to remove the sites from the Green Belt?
- The openness of the Green Belt is a critical feature of the 3 main sites.
- Contrary to purposes of the Green Belt – encroachment into open countryside.
- The Green Belt to the East of Tring gives access to and views to/from the AONB which would be lost if any of the options were adopted.
- Loss of open space for recreation
- A Masterplan will be critical.
- The potential country park along the Grand Union Canal might provide limited mitigation.
- Highly visible from the surrounding roads – the land is flat and will block longer distance views.
- Views to and from the AONB would be detrimentally affected.
- Will increase the population of Tring by 60% - this is too much.
- Some development close to the town edge could be acceptable.
- Has development in the town centre / existing urban area been maximised?

## Question 5: Do you have specific comments about any of the Proposals and Sites?

### Hemel Hempstead

There is the argument that this consultation is poorly timed and extremely premature given that the government is revisiting the required housing figures and of course the pandemic which has changed how everyone now lives and works. The current situation has highlighted just how important open spaces are to the health and well-being of people and the loss of so much in Dacorum, especially around Hemel Hempstead, is totally unwarranted. As stated in NPPF, housing need alone is not an exceptional circumstance to allow such excessive loss of Green Belt land and such intrusive development. Around Hemel Hempstead alone some 392ha of Green Belt will be lost on the north west side where there are 3 blocks of land proposed for development despite Dacorum itself acknowledging that this is an area of high landscape sensitivity.

Hemel Hempstead Garden Communities Spatial Vision, which gives the impression of low density development with substantial open spaces and landscaping, but as Transport for New Homes document (June 2020) headlines: 'Green Promises broken: garden villages will be dominated by the car', and given the amount of development proposed the housing density will be high, together with the added community facilities, there will be little land available for open space. This is clearly favoured by DBC as it was identified as one of several sites for such development and was given a grant of some £750,000 for consultants.

Our comments on the individual sites are as follows -

Phase 1: HH01: 212.2ha. 1550 homes - Includes retail and community facilities, primary and secondary schools, Council depot and household recycling site and a country park of 'district-wide importance'. It will also have 'Suitable Alternative Natural Greenspace' (SANG) to 'offset adverse effects on the Chilterns Beechwoods due to recreational pressure' which the developments would create.

This is possibly the worst and most damaging to the Upper Gade Valley and to the CAONB, which, in the Council's own Landscape Assessment, requires the relatively unspoilt landscape to be conserved and strengthened'. Clearly this cannot be consistent with vast development covering an entire valley side.

It brings development up to the edge of Piccotts End, a small historic hamlet designated a Conservation Area with many listed buildings. It will completely 'wrap around' the hamlet seriously affecting its setting and the quality of life of the existing residents. The proposed development will extend up to and abut the CAONB. The land is on the steep southern slope of the north side of the Gade Valley and therefore any development will physically and visually severely affect the valley and the CAONB. The periphery of Grove Hill can already be seen from long distances and this new development will bring urban development completely into the open countryside. Scant regard is paid to the effects on the setting and views to and from the CAONB nor to the vast increase in traffic, lighting, noise and disturbance to wildlife plus destruction of hedgerows, trees, historic field patterns. As a token, it proposes that an ancient woodland would be saved and possibly supplemented (with ancient trees?). The increased pressure on Ashridge, the Gade Valley Water Meadows and other parts of the AONB will be immense.

Part of the proposal involved a new link to Jn8 of the M1 as part of a new Mass Rapid Transit system to Harlow which is again very 'old fashioned', road orientated thinking which has major environmental implications. A spin off from this is that local traffic will be pushed onto already heavily trafficked rural roads and though villages and hamlets used as 'rat-runs', further affecting the environment and living conditions of existing residents and further limiting the encouragement to cycle or walk. No improvements are proposed for existing roads or existing rural communities.

The Gade Valley is recognised by the Council itself as 'a key biodiversity area with mosaic, wetland, grassland and woodland' which will be completely destroyed. There is no mention of how they intend to mitigate the disastrous and irreparable damage. A vague suggestion of 'landscape structure to develop a series of new green and blue infrastructure corridors' is proposed which replaces existing natural open space with a man-made environment which is certainly no compensation. They state that they will 'enhance or restore hedgerows and field patterns and boundaries', but how can they do this if they are building over the entire area? Similarly, they state they will 'conserve and enhance historic sunken lanes and Public Rights of Way' which is somewhat perverse as in the Marchmont Farm development (included in the Plan as HH22), a new access road crosses over an historic path which will severely affect users of the path which leads from Piccotts End to an area of public open space within Grove Hill!

Phase 2: HH02: 160.9ha, 4000 homes - safeguarded for after 2038 - which is only 17 years away and should be considered now as part of the whole N/NE expansion of Hemel Hempstead. This lies to the north of HH01 around the existing development of Grove Hill and has been planned in conjunction with St Albans City and District Council. However, St Albans' Local Plan has been deemed to be unsound and therefore has been postponed which throws into question this Phase. up to the boundary with St Albans. Thus, the swathe of Green Belt around the northern part of Hemel will be totally lost. The same arguments apply as to Phase 1.

HH03: 5.93ha, 450 homes – These are on the current hospital site, despite the plan to revamp the hospital facilities. Will there be space for that too?

HH21: 55.64ha, 1100 homes – This site is included in the existing Local Plan is known as LA3: West Hemel and an outline planning permission exists for 1100 dwellings, community facilities, travellers site and land for a primary school (reliant of funding from HCC - not the developers!). Considerable opposition was ignored. The wildlife corridor is a couple of metres wide abutting car parking laybys and little open space provision. At least it's within walking distance of the town and station! This development is on 55.64ha of Green Belt and is very visible on the southern slope of the northern side of the Bulbourne Valley.

HH22: 19.15ha. 385 homes and a travellers site - Known in the existing Local Plan as Marchmont Farm, a planning application has just been submitted. This will join up with HH01 so a done deal already.

HH23: 2.71ha, 90 homes, Old Town - This currently provides a soft edge to the entrance and setting of Hemel Old Town. It is steeply sloping, and the proposal is for 90 dwellings, which could be up to 4 storeys in height to 'add interest'. The existing green slope does that!

HH12: Two Waters Moor designated for 60 dwellings. We think this was part of Box Moor that the Trust wanted to have deregistered from Common Land and the DoE rejected. (known as Two Waters Moor East).

## **Berkhamsted**

Berkhamsted is almost entirely surrounded by Green Belt and, to the south and west of the town, this creates an open gap to the A41 which bypasses the town. At present, this area consists of a mosaic of built-up areas and open fields, including agricultural fields and playing fields. The whole of this area is within the setting of the Chilterns AONB to the south, interrupting views from the town and Shootersway in particular.

The scale of development proposed is excessive and would fill up most of the open fields in the area, greatly harming the local environment. We would wish to see development concentrated in the existing urban area of the town and concentrating on the reuse of shops and offices and other conversions. If some development is to be allowed on green fields it should be greatly scaled down.

Our comments on the individual sites are as follows -

BK1 - South of Berkhamsted 850 homes - This is close to A41 for access, so will encourage increased car use.

BK2 - BFI site 90 homes - The effect on the listed building and its setting needs to be addressed.

BK3 - Haslam Fields 150 homes - These are playing fields and loss of sports facilities in town!

BK4 - Hanbury - A wildlife corridor recommended in guidance which would lead to open space at the rear was ignored when pp was granted recently for a complex of unsightly private flats for older residents. (Uplift in numbers 40 to 100+).

BK 6 - East of Darrs Lane 200 homes - This is possibly the worst of the sites. The 22ha parcel of land at the Northchurch end of Berkhamsted, would further erode any distinction between Berkhamsted and Northchurch. It would coalesce with the very low density of existing development along the western side of Darrs Lane, and that on the southern side of Shootersway (BK8). The site is steeply sloping so would be highly visible from the northern side of the valley. It abuts the boundary with the CAONB to the west and would therefore severely impinge on its appearance and character. Both Darrs Lane and Bell Lane are very narrow, steep rural lanes and cannot take any further traffic. Walking and cycling is not considered to be feasible due to the nature of the site. It is a considerable distance from the facilities of Northchurch and Berkhamsted and further traffic through Northchurch High Street will impact on the AQMA.

These are beside the existing Bearroc 1 and 2 sites, so a large chunk at the Northchurch side of town, a further coalescence with the very low density of existing development along the southern end of Darrs Lane, ie modest bungalows and detached houses.

BK7 - Lock Field Northchurch 60 homes - This narrow site is constrained by the main line railway, the canal and the River Bulbourne. This section of New Road is hazardous, sloping and very busy and the footpaths are narrow. This is not conducive for safe use by walkers or cyclists. Again, this would result in additional traffic on the already busy roads. Northchurch High Street has already been noted as an Air Quality Management Area and the added pollution from traffic would further diminish air quality. Any development here, assuming there are no flooding issues, would put severe pressure on traffic over the canal bridge and parking on both sides of the road creates a hazard. Climate change has increased the risk of flooding in numerous areas and as this is adjacent to the River Bulbourne and the canal, no development should be allowed.

BK8 - Rossway Farm 200 homes - With BK6 these areas provide a soft edge to the town which is what development on the southern side of Shootersway was supposed to be, this is alongside the A41. It looks like all these intentions are forgotten and this is poor urban design which will provide an abrupt edge to a market town set in open countryside.

The previously planned “green lung” between the A41 bypass and Berkhamsted is to be eroded by building all along the corridor, and the noise and pollution from the bypass will be a problem for the new build estates as well as loss of wildlife.

This is even further away from the town centre and further erodes the open countryside beyond the recognised urban area and was not previously included in the draft schedule of Site Appraisals, November 2017. Together with BK6, this will begin to coalesce Berkhamsted with Northchurch, clearly contrary to the aims of the Green Belt and put added pressure for possible future development joining with Blegberry (Bk5) for continuous development along the southern side of Shootersway.

BK9 - Bank Mill Lane 50 homes - This is a water meadow with the adjacent building density having exacerbated the problem and this should not be included at all. It also serves as a soft edge at the entrance to the historic market town. The River Bulbourne has already suffered from the proximity of the recent adjacent development which has substantially reduced the wildlife corridor and any further development will severely affect this nationally important chalk stream. No development should be allowed.

BK10 - Hanbury - Already approved

BK11/BK13 - Billet Lane - Lidl pp granted some years ago and Jewsons site, ok if traffic issues onto Billet Lane and High Street controlled, only to same height of flats opposite, 3 storeys, and improvements to the canal side.

BK12 - Civic Centre - The Civic Centre is an important amenity and the Police station remnant is in there, with the increase in population proposed this is even more essential than now, as is the car park which should be retained.

The Plan proposes an additional 390 dwellings using Shootersway plus 176 recently developed at the junction with Durrants Lane known as Bearoc. Shootersway was a quiet road with houses on large plots forming a soft transition from the urban development to the rural land to the south. However, the cumulative effect of these sites will further erode the character, appearance and any wildlife present.

These, together with BK1 - South of Berkhamsted 850 homes, will fill in the gap between existing development and the A41 bypass. These areas provide a soft edge to the town which is what development on the southern side of Shootersway was supposed to be. It looks like all these intentions are forgotten and this is poor urban design as it will provide an abrupt edge to a market town set in open countryside.

The previously planned "green lung" between the A41 bypass and Berkhamsted is to be eroded by building completely along the corridor, and the noise and pollution from the bypass will be a problem for the new build estates as well as loss of wildlife. In addition, it will be detrimental to views to and from the wider rural landscape which lies within the CAONB, including light pollution which severely affects some mammals and birds.

Each site mentions the provision of a wildlife corridor and public access. However, this would be a narrow strip beyond the sites' boundaries immediately adjacent to the A41, a heavily trafficked road causing severe disturbance by virtue of noise, lighting and air pollution. One site, Hanbury has already been granted planning permission omitting public open space and access to the wildlife corridor, so a precedent has been set for the other sites.

In Dacorum's Consultation on Issues and Options for the new Local Plan in 2017, the Haslam Fields Site (BK3) was divided into housing on 3.8ha and biodiversity on 2.7ha. Some 80 -100 dwellings were proposed not 150 as now, and with a large area of public open space /walking field/wildlife area towards the rear. ie not a narrow wildlife corridor.

Despite this vast increase in dwellings, there is no public transport to this part of town and given the distance from the town centre and community facilities including health and education, and location on the ridge of a steeply sloping hill, is not conducive to walking or cycling. It is fatuous to think that people will forgo their cars if they live in this area if they want to visit the town or any meaningful public open space which the Local Plan will not provide. The Council itself has acknowledged that the location of these sites on the valley ridge would 'generally discourage movements by foot and cycle', Therefore, development on this scale on the southern edge of town is not sustainable and the proposals are deeply flawed.

## **Tring**

Tring has a thriving community and has the character of a small historic market town. The character of the town will change completely with the plan for 2,730 new dwellings, which could mean over 6,000 more people.

The starting point is that ONS still states that it is 2.4 people per household. The figure of around 2,700 houses is reached - taking into account already consented and a predicted windfall number. It is correct to factor those into the ultimate number, but taking into account the obvious riposte at an inquiry 'that those will be consented free-standing of the Local Plan'. Therefore, the actual numbers for Tring are 2,274 proposed. If you take into account what is proposed and that which is either already consented or predicted to be by windfall, on the 2.4 basis you will get to a 55% increase of the population (if you did not take into account the windfall and already consented, I think the increase would be 45%). An increase taking into account the figures of 2,730 would on the 2.4 basis, equate to 6552 people.

It is worthy of note that in Tring the plot ratios are generous having regard to national guidance i.e. more land is being taken. This perhaps leads to an argument that perhaps there should be a greater concentration of affordable dwellings, but definitely an argument that the Council is proposing an excessive land take.

Most of the developments are proposed on land which is currently in the Green Belt. The amount of development proposed is excessive and would have a significant harmful impact on the character of the town and its surroundings. We would wish to see development concentrated in the existing urban area of the town and concentrating on the reuse of shops and offices and other conversions. If some development is to be allowed on green fields it should be greatly scaled down.

In normal times, Tring Station car park is completely full by 9am on weekdays, so another huge car park would be required at Tring station.

TR01 – Dunsley 400 homes - This is Green Belt land, and a very sensitive site as it is the Gateway into the old market town of Tring. An “estate” of 400 houses at the entrance to the town would be wholly inappropriate. TR01 is on every side except the town side, bordered by the AONB.

TR02 – New Mill 400 homes - This is Green Belt land, with views over the countryside. It is a historic area of Tring which will lose its identity with such a large invasion of new homes. It is immediately adjacent to TR03 and would therefore constitute a total built area of 1,800 homes.

TR02 is close to, and in the setting of, the AONB.

TR03 – East of Tring 1,400 homes - This is the most sensitive proposal, again on Green Belt land. It is adjacent to the AONB and would therefore have a disastrous impact on it. It would resemble a new town, as it is too far from the centre of Tring to be included in the community. Provisions are planned for new schools in this area, but no provision for Doctors' Surgeries and other services and infrastructure.

The distance from the town means that the proposal is not sustainable, as cars would be back and forth all the time. The same situation of unsustainability would apply to new schools over a mile out of Tring centre, with a large number of residents having to drive, rather than walk. The building of new roads and roundabouts in this Green Belt area is not acceptable.

TR03 is on every side except the town side, bordered by the AONB.

TR04 – Icknield Way 50 homes - This would be added to the number of houses already under construction along Icknield Way.

TR05 – Miswell Lane 24 homes - This site seems to be available for the construction of homes. Unfortunately, it will not be pleasing for the well-established homes on either side of Miswell Lane.

The plan notes that the setting of the Grade II listed Windmill should be conserved, but instead of looking on to a hedge and trees, it will be looking on to a new estate of homes.

Also to be noted is that careful landscaping and design would be required at the other side of this site which borders onto a large number of commercial companies.

TR06 – Brook Street – This proposal is unacceptable. This demands the demolition of historic buildings - Auction Rooms, Fire Station, Tring Local History Museum, Cattle Market, and cottages, which cannot be replaced in historic terms. This area is also regarded as a very attractive entry into Tring High Street.

Overall, the Society has major concerns that the unique character of Tring and its close community will never be the same again, with such a high percentage of new building.

**Question 5A: Are there any other sites that you think should be included in the Plan?**

No specific sites, but a review should be undertaken in the urban areas to identify any buildings no longer in business use for conversion to residential use.

**Question 6: Do you have any comments on the Sustainability Appraisal that accompanies the Plan?**

No comments

**Question 7: Do you agree that the Evidence Base that accompanies the Plan is adequate, up-to-date and relevant?**

No comments

**Question 8: Do you think the Plan is consistent with the National Planning Policy Framework (NPPF) and supporting guidance?**

Our main concern is whether the removal of land from the Green Belt for new development demonstrates the exceptional circumstances required by the NPPF. This is covered in more detail above.

Also, the Plan does not appear to address footnote 6 of paragraph 11, which enables housing numbers to be reduced where there would be a detrimental impact on the Green Belt and/or AONB.

**Question 9: Do you have any other comments on the Plan?**

Just as a conclusion: the Campaign for National Parks states that the government revealed a commitment to create new National Parks, one of which could be the CAONB. They recognise the value to the nation of open space and the key part it will play in a 'green recovery'. Therefore, there should be a pledge to protect and enhance local green spaces not wantonly destroy them by promoting excessive and unnecessary development.

As the Open Spaces Society in their 'Vision for Planning' has stated:

*'Government, Local Authorities and our communities must all work together to provide everyone with access to good quality greenspace closer to home, a vital element of a green recovery following the pandemic.'*

Dacorum, in its rush to publish a Local Plan, has ignored not only the government's questioning of its own housing numbers but also the effects of the pandemic which has changed how everyone lives.