

Dacorum Borough Council Emerging Core Strategy (June 2009)
Response from CPRE – The Hertfordshire Society

Borough Vision

Question 1 (Themes)

Answer: No.

Comments: We would like to see ‘Tranquillity’ added to the bullet point list. We suggest that “*Taking into account the need to preserve or enhance tranquillity across the Borough as appropriate*” should be added to the list immediately below the point about “Conserving and enhancing the Borough’s landscape character ...”

Tranquillity is a concept that has been developed by CPRE, and is the subject of a report *Mapping Tranquillity: defining and assessing a valuable resource* that can be downloaded from the CPRE website www.cpre.org.uk or we can provide a copy on request. The tranquillity map for Hertfordshire ([downloadable from the CPRE website](#)) shows the areas around Hemel Hempstead, Berkhamsted and Tring to be the least tranquil in the Borough – as is to be expected – but smaller settlements and the countryside across the Borough are also significantly affected.

Question 3 (Themes): Location of Development and Change

Yes.

We accept the development strategy as described, and particularly the main elements listed for Hemel Hempstead, the market towns and villages, and the countryside.

However, there is some contradiction between the strategy that the market towns and large villages will remain stable and population growth may not occur (or be only marginal) and the spatial strategies proposed for individual settlements in Part Two of the Emerging Core Strategy. The latter section discusses different assumptions for growth for each settlement, based on either maintaining the existing population (stability) or allowing for some natural change (population growth). Where conflict occurs between these strategies, we consider that the Location of Development and Change strategy should prevail.

Question 4 (Themes): Infilling in Green Belt villages

Yes.

We do not agree that existing policy which strictly limits infilling in the Green Belt villages (Policy 6 in the Dacorum Borough Local Plan (April 2004)) should be relaxed to bring it into line with that for villages in the Rural Area (Policy 8). We can see no real justification for doing that. On the contrary, we believe that the Policy 6 restriction of residential development to small-scale infilling of no more than two dwellings to meet a demonstrable local need should be extended to the selected small villages in the Rural Area.

Question 5 (Themes): Sequential approach to development

Yes.

Not only do we agree with the sequential approach to development outlined, we regard this approach as absolutely essential if all options are to be exhausted before any thought is given to use of Green Belt, which we strongly oppose. Redevelopment of brownfield sites within urban areas, including conversion of commercial space to residential use if appropriate, must be given precedence over development of greenfield land.

Question 9 (Themes): Housing programme and future housing policy

Yes.

It is not entirely clear from the text in the Theme 2 a) Homes section, but we assume from Table 1 that there is considered to be sufficient capacity to meet or even slightly exceed the target of 9,000 dwellings for the period 2006 – 2031 without needing to develop in the Green Belt. We note the intention to plan for a contingency in the form of a greenfield land reserve of 450 – 900 dwellings, and reluctantly accept that this is necessary to ensure that the target is met. However, we expect there to be some form of phasing of housing land release imposed, in order to achieve the sequential approach to development set out under Question 5 above.

The last paragraph of section Theme 2 a) Homes refers to the provision of affordable housing. This is a key issue, and should have been the subject of a section in its own right. The Core Strategy Issues and Options Paper (May 2006) suggested a level of provision of 40% affordable housing averaged across all sites. The Emerging Core Strategy suggests the need for a level of 39% of total dwellings (which we assume to mean new dwellings). We urge the Council to adopt a target of 40% of new dwellings to be affordable.

Looking after the Environment:

a) Heritage, Biodiversity and Landscape Character

The third and fourth paragraphs under this heading should be less urban-centred and seek to address possible deficiencies Borough-wide. Policy ENV 1 of the East of England Plan requires Local Development Documents to ‘define a multiple hierarchy of Green Infrastructure’ and to identify ‘areas where additional Green Infrastructure is required’. The commentary in the EofE Plan makes it clear that this policy applies region-wide and not just in areas of new development.

Policy ENV 3 of the EofE Plan referring to Biodiversity and Earth Heritage requires Local Development Documents to ‘take account of BAP targets and priorities identified in county biodiversity network maps’. This requirement should be referred to in this section of the Core Strategy.

The second paragraph of this section refers to tranquillity (or ‘quietness’) and implies that this is an issue only in countryside areas. We comment on tranquillity in answer to Question 1 above. We would like to see a more robust approach to tranquillity reflecting CPRE’s research, methodology and mapping in this area, which recognises that tranquillity is a Borough-wide issue and relates to visual as well as audible intrusions. Thus noise and other intrusions (eg, unsightly structures and inappropriate lighting) originating within urban boundaries can impact on tranquillity in the surrounding countryside. Further, development control and other policies should recognise opportunities to improve areas of poor tranquillity as well as protect more tranquil areas.

b) Natural Resources

We support the proposal to carry out a water cycle study. In particular we refer to Policy WAT1, paragraph 10.6 of the EofE Plan which sets a target of 105 litres/head/day or Level 3 of the Government's Code for Sustainable Homes as a target for domestic water consumption. Policy WAT3 of the EofE Plan states that: Local Planning Authorities must ensure that their plans, policies, programmes and proposals take account of the environmental consequences of River Basin Management Plans (and other issues) and paragraph 10.10 further emphasises the need to have regard for the implications of the Water Framework Directive. Policy WAT4 of the Eof E Plan stipulates that Local Development Documents must require Sustainable (Urban) Drainage Systems in all appropriate developments. We trust that the water cycle study and subsequent policy statements reflect these regional policies. CPRE's Water Campaigners' Checklist advocates the adoption of water neutrality as a stated aim in Local Development Frameworks, particularly in water stressed areas such as Dacorum. Water neutrality aims to keep water demand constant even as growth occurs, by the retrofitting of water efficient fittings in existing buildings to reduce their water demand, in conjunction with other water consumption reduction policies such as water metering.

CPRE supports the generation of energy from renewable resources, including biomass, on condition that valued landscapes are not damaged as a result and bearing in mind that use of biomass to produce energy must be accompanied by carbon-capture technologies to be of any value in contributing to low-carbon policies. In addition, CPRE advocates measures to prioritise a curb on growth in energy demand, and encourage energy efficiency through actions such as retrofitting of existing buildings. Retrofitting improvements in energy efficiency in existing buildings is also a policy of the EofE Plan (at paragraph 9.4).

Part Two

Spatial Strategy for Berkhamsted

Question 3 (Berkhamsted)

No.

We do not agree with the level of growth of 1,200 dwellings proposed. This would require the release of some land from the Green Belt. Given that growth of 750 dwellings over the plan period would maintain the existing population, we consider that a target of 1,000 new dwellings would be sufficient to maintain the town's vitality.

Question 4 (Berkhamsted)

Yes, we agree that all the locations set out in Table 2 should be ruled out.

Questions 5a to 5d (Berkhamsted): Greenfield development options

We oppose all four Options proposed for greenfield development, each of which would require the release of land from the Green Belt. We object to the following sites, for the reasons given:

Option 1: Land off New Road. This site is in the Green Belt and adjacent to the Chilterns AONB. In addition to the ‘cons’ given in the table in section 4.0 Greenfield development options, this site has wildlife value, enhanced by its proximity to the Grand Union Canal; and it is adjacent to the canal towpath, much used by the public for a variety of recreational purposes.

Option 2: Land south of Hilltop Road. Development of this site would breach the existing defensible Green Belt boundary and contribute to urban sprawl. The effect of this would be intensified by the proximity of Ashlyns School to the south. The setting of the school would be detracted from by development of the Hilltop Road site. The site is partially wooded, so that any development would result in the loss of this wooded area. The site is also partially in use as recreational playing fields, which would be lost as a result of development, yet the Emerging Core Strategy states elsewhere that there is a deficit of leisure space in Berkhamsted. Access from the site to the town centre would either involve use of the narrow Chesham Road or a lengthy circuitous route either to the east or the west.

Option 3: Land adjacent to Hanburys, Shootersway. Development of this site would breach the Green Belt boundary and extend the existing built-up area into the narrow belt of countryside that currently acts as a natural buffer between the town and the A41 road.

Option 4: Land adjacent to Blegberry Gardens, Shootersway. This site is in the Green Belt and forms part of the narrow gap of countryside between Shootersway and the A41. Development in this critical gap would encourage further erosion of the Green belt up to the line of the A41, and must not be allowed to happen.

Spatial Strategy for Bovingtondon

Questions 4a to 4d (Bovingtondon): Development options

We object to the options presented, for the following reasons:

Option 1: Duckhall Farm. We consider that the ‘cons’ given in the section 4.0 table outweigh the ‘pros’. Development of this site would increase the built-up area of the village close to Bovingtondon Prison, which may be considered undesirable.

Option 2: Rear of Green Lane. Development of this Green Belt site would cause encroachment into the countryside without providing a defensible Green Belt boundary.

Option 3: Grange Farm. Development of this Green Belt site would extend the built-up frontage of the village along Chesham Road towards the Whitehart Cross junction and Bovingtondon Brickworks. It would significantly encroach into the countryside.

Option 4: North of Chesham Road. Development of this site would encroach into the Green Belt and bring the built-up area closer to Bovingtondon Prison and the airfield.

Spatial Strategy for Kings Langley

Question 3 (Kings Langley): Level of growth

We question the proposed level of 150 additional dwellings up to 2031, although we accept the principle that development to allow the population to remain stable is needed. The issue is made more complex because the town is split between the administrative areas of Dacorum and Three Rivers. We do not consider that development of Kings Langley should be split proportionately between the two authorities according to each one's area or population share of the town (and see no evidence of this happening). However, we note that the Three Rivers Preferred Options (February 2009) put forward the East Kings Langley employment area for development with an indicative capacity of 180 dwellings. This is previously-developed land whose re-use would be preferable to developing greenfield/Green Belt land in the Dacorum part of Kings Langley. There needs to be a highly co-ordinated approach to planning for the development of Kings Langley between the Borough Council and Three Rivers District Council.

Questions 4a and 4b (Kings Langley): Development options

We object to the two options for residential development in Kings Langley, for the following reasons:

Option 1: Rectory Farm. Development of this Green Belt site would significantly erode the important gap between Hemel Hempstead and Kings Langley. Coalescence between the two towns must be avoided at all costs.

Option 2: Wayside and Broadfield Farms. Development of this site would breach the Green Belt and cause significant encroachment into the countryside. As is noted in the 'cons' column of the section 4.0 table, this is a sensitive open valley location.

Spatial Strategy for Markyate

Question 3 (Markyate): Development options

We believe that the opportunity to bring forward a significant improvement to this village should be grasped. Hicks Road is an important entrance to the centre of the village but it passes through the Industrial Estate, which is run down, unsightly and in need of redevelopment. The location of the Industrial Estate in the middle of the village, adjacent to residential areas, is unfortunate. Hicks Road itself is narrow and the road boundaries are poorly defined.

We believe that Markyate needs to have a general employment area but that this should be relocated. With the relocation of the Industrial Estate, the opportunity would arise for an imaginative scheme for an attractive village entrance and centre. The area is close to existing facilities such as shops, pubs and restaurants and not too far from the school and village hall. While proper consideration should be given to its location in the flood plain, the area could provide some or perhaps all of the following elements: housing, some open space, some small public gardens, an improved health centre, some car parking space and public conveniences. It would be a tragedy to regard the area merely as an opportunity for another small housing estate.

The replacement general employment area could be provided at the south-eastern end of the village. There is already some industrial activity in the area in the form of Smith Brothers recovery service. The area is still close enough to be accessible by cycle or on foot from the

village but traffic, disturbance and pollution would be kept away from the residential areas. Ideally, the area would have its own entrance from the A5.

While this proposal would require some release of Green Belt land, we consider that, in this exceptional case, planning considerations and the overall benefit to the village would justify the release, provided that sympathetic and imaginative proposals for Hicks Road were forthcoming.

Spatial Strategy for Tring

Question 2 (Tring): Level of growth

No.

Tring enjoys a unique setting in the Green Belt and bordered by the Chilterns AONB. Natural expansion of the town is severely constrained by the AONB boundary and A41 road to the south and the B488 Icknield Way to the north and west. On the eastern side, the Green Belt wedge between London Road and Station Road provides a 'green gateway' to the town from the A41/A4251 approach.

We are strongly of the view that growth in Tring should be kept to the absolute minimum necessary to maintain stability and retain vitality. No provision should be made for 'natural growth' that would require expansion into the Green Belt or AONB.

Questions 4a and 4b (Tring): Development options

We oppose both the options proposed, for the following reasons:

Option 1: Land to the West. This represents a significant expansion of the town to the west, into the Green Belt and right up to the boundary of the AONB. The site is readily visible from the AONB and from the Icknield Way. It is a considerable distance from the town centre and a long way from the railway station.

Option 2: Land to the East. There is no justification in terms of housing need for large-scale development of this site in the Green Belt. As the Council acknowledges in the 'cons' column of the section 4.0 table, this green corridor into the town centre is an essential part of the town's character. It forms part of the panoramic views of the town from the Chiltern escarpment and the Ridgeway National Trail, extending round to the hills to the east. The area includes a large County wildlife site whose integrity would be affected by development around it.

Question 5 (Tring): Key built and environmental assets

Yes.

We consider it essential that the key built and environmental assets of Tring should be protected and enhanced.

Spatial Strategy for the Countryside

Question 2 (Countryside) The Vision

No.

In the Vision set out in section 2.0, we would like to see the words “*timber and*” inserted before “wood fuel” in the second sentence. Many of the Borough’s woodlands should be capable of producing good quality timber as well as low grade wood for fuel. Management for timber need not be incompatible with landscape and biodiversity conservation and recreational use.

Question 3 (Countryside) Key Issues

Yes.

In paragraph 3.11, add “*and biodiversity*” after “the landscape”.

In the ‘Key Issues’ box:

- first bullet point: delete the words in brackets, since this issue applies Borough-wide;
- second bullet point: add “*and the landscape*” at the end.

Questions 4a and 4b (Countryside): Level of housing

We strongly prefer Option 1 for 389 dwellings spread among the small villages. We oppose Option 2 for 567 dwellings that would require more rural exception sites to be agreed.

Question 5 (Countryside): Looking after the Environment

Yes.

There is an opportunity under this section to look at the Strategy and Guidelines for Managing Change for each Landscape Conservation Area within the Dacorum Landscape Character Assessment. As well as using these to guide development control, there is a wealth of information on the actions required to restore, improve and conserve the landscape which would benefit from a Borough-wide proactive approach, perhaps project officer led, to include larger-scale habitat creation and the development of linkages between areas of biodiversity, and not just identified County Wildlife sites. An increase in biodiversity would also contribute to carbon-fixing.

Question 6 (Countryside): Economic prosperity

With regard to paragraph 5 c) (i), we perceive problems with promoting wood fuel and biomass. While they are renewable sources of energy they are not low-carbon unless used with appropriate carbon-capture technology. Biomass crops potentially have a significant impact on the appearance of the landscape. With the new emphasis on food security, local foods and reducing food miles, economically viable food production should have higher priority.