

**DACORUM DRAFT CORE STRATEGY CONSULTATION November 2010**  
**Response by Campaign to Protect Rural England - Hertfordshire**

---

**Question 1:** Do you support the Borough Vision

Yes

**Question 2:** Do you support the Strategic Objectives

No.

There are no references to the Countryside and Rural Environment, despite these being addressed in proposed policies CS5 and CS7.

Objective 12 could be amended to read: " To protect and enhance Dacorum's countryside and rural environment, especially distinctive landscape character, open spaces, biological and geological diversity, and historic environment."

**Question 3:** Do you support the approach to 'Promoting Sustainable Development' set out in Section 9?

Yes, subject to the comments on individual policies outlined below.

Policy CS1: Distribution of Development

Policy CS2: Selection of Development Sites

We support these policies and welcome the sequential approach proposed.

Policy CS4: The Towns and Large Villages

We support this policy, but consider that explicit reference should be made to the intention to keep non-conforming uses to a minimum (which is implicit in paragraph 9.18).

Policy CS5: Green Belt

We support this policy. While there are passing references to national policy in sections 2 and 5, the policy could be considerably strengthened by explicit reference to national Planning Policy Guidance Note 2 (Green Belts).

Policy CS6: Selected small villages within the Green Belt

We should like paragraph 9.34 to stress that the criteria relating to local character, design and scale will be considered as especially important in the case of all infilling.

There also needs to be a clearer definition of "backland development" in the same paragraph. As currently worded, the policy appears to rule out all backland development. While CPRE Hertfordshire would not normally support such proposals, we do not consider that all backland development is invariably undesirable.

**Question 5:** Do you support the approach to 'securing quality design' set out in section 11?

Yes

**DACORUM DRAFT CORE STRATEGY CONSULTATION November 2010**  
**Response by Campaign to Protect Rural England - Hertfordshire**

---

**Question 7:** Do you support the approach to providing for offices, industry, storage and distribution set out in Section 13?

Yes, subject to the comment on Policy CS15 below.

Policy CS 15: Offices, Research, Industry, Storage and Distribution

We perceive that there is a large volume of unoccupied office and industrial floor space in Hemel Hempstead. Consequently the construction of new office floorspace should be restricted, unless or until a positive demand can be demonstrated.

**Question 9:** Which annual housing target stated in Policy CS17 do you support?

CPRE Hertfordshire supports Option 1 because we consider that the strategy should be based on the principle of restricting housing development outside existing settlement boundaries.

**Question 10:** Do you support the approach to providing homes set out in Section 15?

No, for the reasons set out below.

Policy CS17: Housing Programme

Policy CS18: Mix of Housing

Policy CS19: Affordable Housing

Policy CS20: Rural Exception Sites

Policy CS21: Existing Accommodation for Travelling Communities

Policy CS22: New Accommodation for Gypsies and Travellers

We have concerns with elements of the supporting text relating to these policies.

In paragraph 15.10, we consider that 'demand' in the first sentence should be replaced by 'need'. Assuming nil-net migration this would reflect the measurement of housing supply against the actual requirement of the local community rather than the aspiration.

In paragraph 15.15, we consider that the proportion of new homes meeting the definition of 'affordable' in both options (27.5% in Option 1 and 29.0% in Option 2) is too low and inconsistent with the 35% affordable homes mentioned in paragraph 15.31. (We also note that the numbers in paragraph 15.15 are not reconciled with those in Table 9.) The Core Strategy Issues and Options Paper (May 2006) suggested a figure of 40%, which is more in line with our expectation. If this was used, the figures for affordable homes in the table in paragraph 15.15 would be increased to 3,400 and 4,500.

In paragraph 15.21 we support the proposal to phase housing sites, but are concerned that the six year New Homes Bonus programme could result in the Borough Council encouraging an acceleration of that phasing to take advantage of the 'Bonus'. We would welcome a statement that the New Homes Bonus will not affect responsible phasing over the whole of the strategy period.

**Question 11:** Do you support the approach to meeting community needs set out in Section 16?

No, for the reasons set out below.

**DACORUM DRAFT CORE STRATEGY CONSULTATION November 2010**  
**Response by Campaign to Protect Rural England - Hertfordshire**

---

Policy CS23: Social Infrastructure.

We are concerned by the third sentence of the policy: "The provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt." This is contrary to the core strategy Strategic Objective 12 and, in the case of Green Belt, the provisions of PPG2. While we recognise that new school facilities may be required, providing them in these locations (and, presumably, utilising the vacated former school sites for housing) should be resisted. Such a provision would be seriously damaging to the protection of Open Land and the Green Belt.

**Question 12:** Do you support the approach to enhancing the Natural Environment set out in Section 17?

Yes, as far as it goes. However, while the section refers extensively to both the Dacorum Landscape Character Assessment and Green Infrastructure proposals, there seems to be a lack of linkage between the two. The Strategy and guidelines for Managing Change for each Landscape Conservation Area within the LCA are intended to guide development control, but also contain a wealth of information on the actions required to restore, improve and conserve the landscape which would benefit from a Borough-wide, proactive approach. There is no reference to the link between this information and the developing Green Infrastructure proposals.

**Question 14:** Do you support the approach to 'Using Resources Efficiently' set out in Section 19?

Yes.

Policy CS29: Sustainable Design and Construction

We welcome the principle to plan to limit residential water consumption. We would also urge the adoption of water neutrality as a stated aim of the Strategy. 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 water consumption reduction policies such as water metering, and by the use of other measures such as sustainable urban drainage schemes.

**Question 15:** Do you support the common local objectives set out in Section 20 Place Strategies?

Yes, but we have specific concerns relating to individual place strategies as set out in our responses to questions 16 to 30.

**Question 16 Hemel Hempstead:** Do you consider that the Local Allocations in Section 21 (which are in Housing Option 2) are appropriate?

No

We do not consider that the Local Allocations in Section 21 for Housing Option 2 are appropriate and would oppose development of locations LA1, LA2 and LA3, which are all within the Green Belt. These locations should not be included in the Strategy.

**Question 17 Hemel Hempstead:** Do you support the approach to 'Hemel Hempstead Place Strategy' set out in Section 21?

No.

**DACORUM DRAFT CORE STRATEGY CONSULTATION November 2010**  
**Response by Campaign to Protect Rural England - Hertfordshire**

---

We do not accept that “further extension of Hemel Hempstead’s residential areas may be necessary or appropriate’ (page 146). Specifically, we would oppose the development of the area to the east of Spencer’s Park and south of the Nickey Line, because of the increased risk of coalescence with Redbourn.

**Question 18 Berkhamsted:** Do you consider that the design and layout principles listed for Proposal SS1 (Egerton Rothesay School) are appropriate?

No.

This proposal is in conflict with proposed Core Strategy policies CS1, CS2 Part B4, CS4 and CS5.

The Draft Core Strategy correctly notes that this site is in a sensitive ridge-top and edge of town location, at the top of the valley. Further, the Site Assessment and Local and Strategic Allocations document correctly notes that it is a greenfield site and there will be a loss of wildlife habitats. The site is 2.2km from the town centre and has no good transportation linkage, which means that it will generate increased private car movements.

The proposed housing density is also too great. 200 dwellings on the approximately 6 hectares available for housing would be a far greater density than that on the directly adjacent residential areas along Shooterway, Coppins Close and Chalet Close. The Spatial Strategy for Berkhamsted (part of the emerging Core Strategy dated June 2009) stated that for the upper valley sides the key principle for new housing would be “detached housing on large plots at very low densities” and “new development should be low density” (Table 1) Proposal SS1 does not conform to those principles.

The proposal also extends the site beyond the original boundaries encompassed in the current adopted Local Plan to include an additional 2 hectares of Green Belt land west of Durrants Lane. Although it is proposed that this additional land would be used for school playing fields, it effectively allows for more housing units to be built east of Durrants Lane on what would otherwise have been the playing fields.

**Question 19:** Do you consider that the Local Allocation LA4 (Hanburys) is appropriate to meet the longer term needs of Berkhamsted?

No.

The proposal conflicts with the following proposed Core Strategy policies: CS1, CS2 PartB4, CS4 and CS5.

The site is in a sensitive ridge-top and edge of town location, at the top of the valley, a greenfield site where development would cause a loss of wildlife habitats. The site is 1.4km from the town centre and has no good transport linkages. The site will generate increased private car traffic.

The site is outside the present town boundary and lies in the Green Belt. It appears that the proposal for approximately 60 new homes would represent a housing density that would not comply with the policy in the Spatial strategy for Berkhamsted that the development on the ridge-top and upper valley sides should be low density.

**DACORUM DRAFT CORE STRATEGY CONSULTATION November 2010**  
**Response by Campaign to Protect Rural England - Hertfordshire**

---

**Question 20:** The British Film Institute is next to Hanburys. In order to survive, the BFI will need to invest and expand its uses. To what extent do you think the Council should support the BFI?

The BFI should be supported as far as is possible without causing harm to the Green Belt outside the boundary of the site.

**Question 21:** Do you consider that the Local Allocation LA5 (New Road, Northchurch) is appropriate either to provide new homes or to help fund the delivery of a road link from New Road to Springfield Road?

No.

The site is outside the present town boundary and lies in the Green Belt. Development would have an adverse impact on the Chilterns AONB, especially by changing the character and setting of the Grand Union Canal and extending from the canal and its towpath into the Chilterns AONB. Development in this area should not be permitted in order to provide financial contributions to enable the construction of the New Road / Springfield Road link for the reasons given in the "New Road Springfield Road Feasibility Report" commissioned by Herts County Council.

**Question 22:** Do you support the approach to Berkhamsted Place Strategy set out in Section 22?

No.

We consider that further expansion of Berkhamsted should be resisted. It already has an appropriate level of development for a market town with a suitable mix of uses and has reached capacity, with the physical infrastructure including water, power, sewerage, roads and transport and parking under strain. We therefore do not support either Option 1 or Option 2. The linear nature of the town, constrained by the topography of the Bulbourne Valley, reduces the sustainability of any new development beyond the town's present boundary. We would also oppose the placing of any new schools in the Green Belt (para.22.4).

**Question 23 Tring:** Do you consider that Local Allocation LA6 (off Icknield Way, west of Tring) in Section 23 (which is in Housing Option 2) is appropriate to meet the long term needs of Tring?

No, Local Allocation LA6 is not appropriate

Change required: Option 1, the provision of 330 new homes, should be followed for Tring.

Reasons: The reasons were set out by CPRE Hertfordshire in our response to the emerging Core Strategy in 2009, including that Tring has reached the natural limits defined by its setting in the Chilterns A.O.N.B and the Green Belt.

**Question 25 Kings Langley:** Do you support the approach to 'Kings Langley Place Strategy' set out in Section 24?

Yes

**DACORUM DRAFT CORE STRATEGY CONSULTATION November 2010**  
**Response by Campaign to Protect Rural England - Hertfordshire**

---

**Question 26 Bovingdon:** Do you consider that Local Allocation LA7 (land to the north of Chesham Road in Section 25 (which is in Housing Option 2) is appropriate to meet the long term needs of Bovingdon?

No, Local Allocation LA7 is not appropriate

Change required: Option 1, provision of 90 new homes, should be followed for Bovingdon

Reasons: CPRE Hertfordshire objected to all 4 option sites in the 2009 consultation on the emerging core strategy. These sites included the site now set out as LA7.

**Question 30:** Do you support the approach to the Countryside Place Strategy set out in Section 27?

Yes, although we also have the following comments on elements of the supporting text:

Paragraph 27.12 refers to the public use of the countryside and there are references elsewhere in the Strategy to facilities for leisure and recreation and the need to promote exercise. However, nowhere is there a reference to the use of the existing and extensive public rights of way network. More could be done to promote the use of the network and access to the network away from over-used areas and especially close to towns and villages. This could help to lessen pressure on the over-used areas while also reducing car use and pressure on rural lanes.

Paragraph 27.18 contains a brief reference to tranquility in the countryside, mainly in respect to transport. This ignores the impact of other development. The Core Strategy should recognise that tranquility is a Borough-wide issue and relates to visual as well as audible intrusions. Noise, unsightly structures, and inappropriate lighting originating within urban boundaries can impact on tranquility in the surrounding countryside. Further, development management and other policies should recognise opportunities to improve areas of poor tranquility as well as protect more tranquil areas.

The countryside in the Borough suffers from all forms of light pollution. "Skyglow" is especially widespread. We suggest that the Strategy contains an aspiration to reduce light pollution by exercising strong control over proposals involving lighting, by progressively improving street lighting and by removing lighting where there is no significant need for it.

15<sup>th</sup> December 2010