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Standing up for Hertfordshire's countryside

Robert Freeman
Planning and Development
Dacorum Borough Council
Civic Centre
Marlowe
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Our Ref:

Your Ref:

12th August 2020 (by email)

Dear Mr. Freeman,

Application No. 20/01754/MFA

Construction of 28 residential dwellings (including 50% affordable housing) with access off Tring Road, including parking and garaging, creation of public open space, landscaping, and all enabling and ancillary works on Land Off Tring Road, Wilstone, Hertfordshire

CPRE Hertfordshire object to this proposal for residential development in the Rural Area Beyond the Green Belt which is contrary to policies in the National Planning Policy Framework and The Dacorum Core Strategy, 2006 – 2031.

This proposal appears to be an extension of application 4/00024/19/MFA for 15 dwellings submitted by the same applicant, which has not yet been determined by the Council. That application was put forward as an entry level exception scheme under paragraph 71 of the NPPF. The provisions of para. 71 do not apply to this application.

Wilstone is defined in the Dacorum Core Strategy as a small village within the Rural Area Beyond the Green Belt. These are described as “the least sustainable areas of the borough”. It is acknowledged that some development will be required within the countryside. “In order to ensure that rural communities continue to thrive there may be the need for specific rural sites for affordable housing ...The location of these sites will be considered through the Site Allocations DPD.” The identification of local needs will be informed by village appraisals. This is not a site allocated through the DPD.

Policy CS7 says that small-scale development for housing will be permitted at Aldbury, Long Marston and Wilstone, provided that it complies with Policy CS1: Distribution of Development and Policy CS2 Selection of Development Sites. Policy CS20 will only permit small scale schemes for local affordable housing in and adjoining the selected small villages where they meet an identified local need the scheme is of a scale and design that respects the character, setting and form of the village and surrounding countryside.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

Registered Charity 1162419



The NPPF says that the size of a development must be proportionate to the size of the settlement. The scale of development has to be considered in context. In a large town or city 28 houses would be small scale. There are currently approximately 280 houses in Wilstone. This development would increase its size by 10%. That is not small scale. This site, though immediately adjoining, is outside the settlement boundary. Consequently it will result in an outward extension of the settlement into the open countryside.

While there appears to be no specific affordable housing needs appraisal for Wilstone itself, in 2018 an assessment of housing need in Tring Rural Parish, covering all six villages, was carried out. That identified a need for 13 affordable housing units. Based on the demand figures in Table 6 of that assessment, Wilstone has a need for 4 affordable homes.

The Planning Statement accompanying this application states that the site has “a number of local facilities and services accessible on foot and public transport to local services and facilities”. That is a little disingenuous. The village has a village hall, a pub and a part-time convenience shop. Employment, educational, health, recreational and retail facilities are all located in Tring, some 5 kilometres away. The nearest railway stations are at Tring (7km.) and Cheddington (5.7km.) In the Chartered Institute of Highways and Transportation ‘Guidelines for Providing for Journeys on Foot’ the acceptable walking distance is 1km and the desirable 800m. (The absolute maximum distance for a fully mobile person is 2km.) Department of Transport ‘Policy LTN1/04 on Walking and Cycling’ says “*The mean average length for walking journeys is approximately 1 km and for cycling, it is 4 km.*”

Consequently all significant services are significantly over an acceptable walking distance (Not the ‘acceptable’ 2 km. mentioned in the Transport Assessment). The Redline 164 bus service only runs once an hour to Tring, with a break mid day for 2 hours and stops at 6:00pm. Startravel 167 to Leighton Buzzard has one bus per day and 207 to Hemel Hempstead once a week. This is not conducive to sustainable commuting. Given that the majority of units on the site are for family housing, it is inevitable that those households will be car dependent. NPPF para 103 says that “*development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*” In our view, this development is not sustainable.

The site is currently in arable cultivation. There is no reference in the application to the agricultural land classification of the site. The Agricultural Land Classification Map for the Eastern Region (ALC008) shows that the site is classified as Grade 3. Both the NPPF and Saved Policy 108 of the Dacorum Local Plan give protection to Grades 1, 2 and 3a. Policy 108 says that development on Grade 3a land will be refused. The Council will have to satisfy itself on the classification of this site before determining the application.

On the proposed design and layout of the development, we note that in the Statement of Entry Level Housing Needs prepared for application 4/00024/19/MFA Rectory Homes stated



that “flats are not proposed on the site in Wilstone due to the nature of this development site and its location.” Consequently we are surprised that 28% of the affordable housing in this application, less than a year later, are flats. There is no explanation for the fundamental change.

It is not clear that the proposed public open space will integrate and connect with walkers along the Grand Union Canal, for wider public benefit; in fact the whole relationship of the built form to the Canal feels poorly considered and an opportunity missed. The layout and built forms generally are quite arbitrary lacking a coherent approach to the site or context.

We are also concerned that the proposed layout indicates the potential for both vehicular and pedestrian access to the adjacent field, facilitating future development. Should the Council be minded to approve this application this potential should be removed.

This unsustainable development will clearly have an adverse impact on the openness of the Rural Area Beyond the Green Belt and extend the village beyond its settlement boundary. In our view, this application does not meet the requirement of the policies in either the NPPF or the Dacorum Core Strategy and should be rejected.

Yours sincerely,

David Irving