

Dacorum Local Plan Revised Strategy for Growth Survey (2024-2040) Dec 2023

CPRE Hertfordshire response

Overall position

CPRE Hertfordshire notes the Council's present consultation which we believe responds to local community concerns to some extent, with regard to recognising the importance of specific designated protected land such as Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB) in certain locations. Recent Local Plan public consultations in neighbouring Districts such as Hertsmere and Three Rivers have also indicated very considerable public concern about the potential loss of highly valued open countryside.

The original Regulation 18 "Emerging Strategy for Growth" document attracted a record-breaking number of public responses. The present brief document (50 pages) recognises that key issues were raised by the community during the public consultation on the Emerging Strategy and proposes four changes (paragraph 1.2):

- Reducing the levels of housing growth, considering our unique constraints and pressures on infrastructure;
- Ensuring growth is more proportionate for our market towns;
- Maximising urban capacity in sustainable locations; and
- Exploring further opportunities for regenerating Hemel Hempstead's employment and retail areas.

Our concerns

The Council notes that this is a partial consultation on a limited number of changes and that they will consider whether any further changes are necessary before publishing the Submission Local Plan in 2024. Whilst CPRE Hertfordshire appreciates the changes made with regard to an overall reduction in housing growth throughout the Borough area, we continue to have significant concerns with the emerging Local Plan, which include:

- Very considerable amounts of Green Belt still proposed for the allocation of development, circa 466 hectares
- Continued high levels of growth
- Continued use of the "Standard Method" and out-of-date population and household projections
- Insufficient consideration of brownfield sites
- Continued impacts on market towns and villages
- Hemel Garden Communities

- General impact on the Green Belt and AONB
- Affordable housing in Green Belt and elsewhere
- Continuing lack of concern for additional environmental issues
- AONB, SAC and SANG
- Water supply constraints and chalk streams
- Waste water issues
- Local sites for SANG

Each of these concerns is discussed further below.

The consultation document is not a “revised strategy” but rather a series of changes to the proposals for settlements in the Borough and “the countryside” in terms of specific site allocations for housing.

Continued high level of growth

The Revised Strategy for Growth does not challenge the underlying rationale of the Emerging Strategy which sees the continued increase and direction of physical development as being the principal and overall objective of the Local Plan. There appears to be no further opportunity to review the role and contribution of the countryside which makes up the large majority of the land area of the Borough.

No suggestion is made that the short-comings of the Emerging Strategy with regard to all topics other than housing will be re-considered. It is not clear whether any further consultations will be undertaken under Local Plan Regulation 18 which permits responses on the content of the Local Plan. (Consultation under Regulation 19 relates only to process, not content).

This consultation is limited to changes in specific site allocations for housing and nothing else. The reduction in housing should provide the Council with further opportunity for the more appropriate consideration of issues relating to climate change, biodiversity and related environmental topics which received scant attention in the Emerging Strategy.

Continued damaging and unnecessary housing allocations

Whilst CPRE Hertfordshire welcomes the overall reduction in housing allocations in specific locations with policy constraints, which include Green Belt, growth is still related to application of the “standard method” without recognising the over-riding principle of designated protected land being applied throughout the Borough, as required by paragraph 11 and footnote 7 of the National Planning Policy Framework (NPPF). This means that Dacorum Borough Council is continuing to propose allocations in the Green Belt which are damaging and unnecessary, comprising the removal of a total of 466 hectares of Green Belt, as opposed to 746 hectares in the Emerging Strategy.

We note that approximately 3,600 fewer dwellings are proposed throughout the Borough during the plan period, apart from Hemel Hempstead which will be accommodating a further 1,500 units. We are however most concerned that allocations for 3,000 additional houses

are being proposed for Hemel Hempstead beyond the plan period and in the Green Belt, and this is unacceptable.

Increasing numbers of local planning authorities are pausing the preparation of their Local Plans in the expectation of forth-coming revisions to the NPPF, following recent public consultation, which are likely to vary the requirements with regard to the calculation of future housing need. It is anticipated that these revisions will further safeguard Green Belt protections and together with the use of up-to-date population and household projections.

This is likely to have significant implications for the number of new dwellings which need to be provided in the future. We urge the Council to delay consideration of housing allocations until the publication of the revised NPPF.

Brownfield first and density

We note that the Revised Strategy allows for over 4500 units to be accommodated on previously developed land (brownfield land) within the plan period. We believe that there may still be further capacity and would press the Council to re-assess opportunities for re-development and re-consider the criteria used for urban capacity and similar studies, and the potential role of windfall sites. CPRE campaigns nationally for the use of previously developed sites before any other land is considered.

We also note the inconsistency regarding suggested housing densities on Green Belt sites proposed to be allocated. In the sites at Hemel, Bovingdon and Tring, the proposed density is approximately 14 units per hectare, whereas in Berkhamsted it is almost twice that figure.

No explanation is provided for the difference in proposed densities between the sites. Housing density can be related to high quality design and both the Revised Strategy and the previous document fail to address the opportunities that can arise to make the best use of scarce land resources through innovative architecture.

Continued impacts on market towns and villages

Whilst CPRE Hertfordshire welcomes the adjustment of site allocations in the Borough's market towns and villages, including Berkhamsted, Tring, Kings Langley and Markyate in view of local community concerns, the remaining allocations in Berkhamsted, Tring and Bovingdon constitute highly valued protected countryside. Extensive and well used Public Rights of Way are present within or alongside site allocations in Berkhamsted and Tring and these would be detrimentally affected by residential development in these areas.

The impact of development on the setting of the Chilterns AONB has been already been noted, and will be discussed further below. These impacts are exacerbated by the sensitive high ridgetop location of the proposed allocation at Berkhamsted which will mean that development will be visible over long distances.

Local community responses have emphasised the impacts of future large-scale development on existing services and facilities which are already under severe pressure. The large

allocations remaining in Berkhamsted (for 850 dwellings) and Tring (250 dwellings) will place very significant strains on existing services, facilities and infrastructure.

Existing highways and transport networks are inadequate to deal with existing pressures, let alone additional demand. The peripheral locations of the allocations to existing settlements at Berkhamsted and Bovingdon will mean that developments are inevitably car oriented, adding further congestion and pollution.

There is also a need to compensate for proposed development by the provision of open space through Suitable Alternative Natural Greenspace (SANG) which is required by legislation. We discuss this and related issues further below and this adds to our concerns regarding the inadequate nature of the present consultation.

Hemel town centre

CPRE Hertfordshire welcomes the allocation of further housing provision in Hemel Hempstead town centre but believes that there is significant scope for additional provision through regeneration and redevelopment. Huge changes are taking place in retail, personal and commercial services and working practices which will impact on town centres in the near future.

The Local Plan should include more imaginative and innovative treatment of the town centre to reduce pressure on open countryside and provide accommodation for increasing numbers of small households and new businesses. The emphasis for housing provision is still on the development of presently open countryside and this is particularly unacceptable when, with imagination and commitment, the town centre offers further opportunities for regeneration and additional activity in all sectors.

Hemel Garden Communities (HGC)

Our primary concern is the continued promotion and proposed expansion of the “Hemel Garden Communities”. Notwithstanding our previous remarks regarding the magnitude of the housing proposed to be provided as a whole, the Revised Strategy proposes extensive expansion of Hemel Hempstead to the north on 373 hectares of agricultural land in the Green Belt and the setting of the Chilterns AONB. This is in addition to the 339 hectares of neighbouring Green Belt land proposed for the St Albans City and District Council portion of the “HGC programme”.

This is intended to be achieved through the “Hemel Garden Communities (HGC) programme”(sic) which is described as a joint project of the Council, St Albans City and District Council, Herts County Council, Herts Local Economic Partnership (LEP), Herts Innovation Quarter, the Crown Estate and other land-owners. It envisages 11,000 new dwellings, half of which are proposed for Dacorum and half for neighbouring St Albans.

Paragraph 2.6 of the Revised Strategy refers to the HGC “proposal” as being “recognised by the Government” through awarding Hemel Hempstead ‘Garden Town’ status in 2019. This

confers no status in planning terms, and it is for the Local Plan process to determine whether such a proposal is appropriate.

Of the 5,500 units proposed for Hemel Hempstead, one site seeks to accommodate 2,500 within in the plan period to 2040 (para 2.11), but Appendix 1 Site Requirements for Hemel (Appendix 1(a)) North Hemel (1), refers to ‘around 3,000 dwellings to be delivered post 2040’. It is not appropriate nor in any case necessary for the Local Plan to make proposals beyond the plan period to 2040, especially when this may entail the use of designated protected land.

Impacts on the Green Belt and setting of the AONB

CPRE Hertfordshire has previously expressed strong objection to the “HGC programme” which appears to take no account of the strong statutory protection of the land affected. We also object to the use of the term “garden communities” without any further indication of the implications of that terminology.

The Garden City movement has an illustrious history since the beginning of the 20th century in promoting a sophisticated and comprehensive set of criteria and guidelines controlling all aspects of the development of a sustainable community. Its early influence was considerable but the approach has been diluted by the general addition of the word ‘garden’ to any number of low density residential proposals without consideration of the community and social infrastructure intrinsic to the original concept.

It is entirely inappropriate that the Crown Estate, as a “public body (which) seeks to work with the grain of prevailing government policy”, is promoting a development of 11,000 houses on designated protected land, the Green Belt, and setting of the Chilterns Area of Outstanding Natural Beauty (AONB). Recent Ministerial statements have been very clear that Green Belt and AONB designations are to be maintained, if not enhanced.

There are serious worries over the major physical infrastructure such as transport, sewerage and water supply which would be required. Dacorum Borough’s own evidence base for its Local Plan points up the need for extensive near-term network upgrades in infrastructure which would be both disruptive and hugely expensive.

To these may be added the severe impacts of extra housing on the Chilterns Beechwoods Special Area of Conservation and the globally significant chalk stream of the River Gade. The promotion of this development in this location continues the full fronted assault on the Green Belt which is causing massive damage to highly valued and productive countryside.

CPRE Hertfordshire believes that it is critical that the commitment to the permanence of the Green Belts is maintained in planning policy, with alterations only taking place in exceptional circumstances, as presently noted in the NPPF. Green Belt policy continues to be effective in preventing urban sprawl, and at present, the rate of development in Green Belt exceeds significantly that in other protected landscapes, such as National Parks and AONB.

As already noted, developments in the Green Belt are land-hungry and are not providing the truly affordable homes we need to face the housing crisis. Analysis by CPRE of thirteen recently developed Green Belt projects showed that only 5% of the housing built was “social housing” (under the present definitions) which was significantly less than that called for by local planning policy in all cases (CPRE State of the Green Belt Report 2023; London 2023).

The advantages of the Green Belt are readily understood and appreciated. The Green Belt is the countryside next door for millions of people, especially in Hertfordshire where it provides crucial breathing space for a large population. The physical and mental health benefits of the Green Belt were recognised widely during the recent pandemic. Residents and visitors alike discovered countryside nearby that they did not know existed.

Green Belt land provides a vital space for nature and recreation and includes a significant number of our nature reserves, as well as double the national density of public rights of way, providing access for all. Through the protection and enhancement of Green Belt land, we can increase its natural and recreational values, as well as providing a natural solution to the climate emergency through carbon sequestration. Crucially, the defining feature of the Green Belt is its permanence, the assurance that it will be maintained for generations to come.

Affordable housing in HGC and elsewhere

It is increasingly accepted that the existing methods of attempting to achieve affordable housing in HGC and elsewhere, through the imposition of planning obligations on private developers, are failing to make any appreciable impact on the problem. Initial commitments by developers for affordable housing are frequently revised downwards, with developers claiming loss of financial viability.

The largest proportion of proposals, in terms of units, for residential development on Green Belt are made by volume house-builders for sale on terms significantly in excess of average household incomes in the County. There is no indication in the Revised Strategy of any realistic attempt to tackle what is generally regarded as the “housing crisis”, that is, critical shortages in specific housing sectors, such as housing for social rent and including truly affordable rural housing.

Continuing lack of concern for critical environmental issues

We are greatly disappointed that the “Revised Strategy for Growth” document is limited entirely to changes in housing allocations while omitting to consider further significant weaknesses in the previous “Emerging Strategy” Regulation 18 consultation draft. By ignoring these issues, the present consultation lacks credibility as a comprehensive local planning exercise.

CPRE Hertfordshire has already noted the lack of taking into account the requirements of the NPPF, paragraph 11 and footnote 7, with regard to the allocation of sites for housing and other activities in designated protected land, and the inappropriate use of out-of-date data relating to household projects. These have significant implications for the quantum of housing required in the future and calls into question the basic premise of the Local Plan to provide for “growth.”

As noted previously, this partial consultation does not address the lack of consideration of alternative strategies based on a comprehensive assessment of the local conditions and objectives which lead to physical development. This continues to ignore the contribution, opportunities and constraints related to the countryside which makes up 85% of the Borough’s area.

“Sustainable development”, the primary objective for local planning, should be about delivering an environment for the next generation in an equal or better state than the one inherited. The Council should be defending rigorously the natural capital of the Borough area, not adopting a strategic approach which allows that capital to survive only when left behind by its unjustified growth agenda.

New requirements for Local Planning Authorities following from the Natural Environment and Rural Communities Act 2006 and more recently the Environment Act 2021 should be reflected in the Dacorum Local Plan. The Environment Act 2021 strengthens the duties of all public bodies with regard to conserving biodiversity and policy for such provision should be included in the Local Plan.

We reiterate our concerns about specific environmental issues which affect the countryside and receive wholly inadequate attention in the Revised Strategy. These include matters which relate to the impact of the “Hemel Garden Communities programme” as well as more generally.

Chilterns AONB, Special Area of Conservation (SAC) and Suitable Alternative Natural Greenspace (SANG)

The one third of the countryside in Dacorum Borough which is within the Chilterns AONB is a designated protected landscape of national importance which the Council has a duty to protect and enhance, both the area and its setting. The present document again fails to mention the Glover Report, commissioned by DEFRA in 2019 which recommended that the Chilterns become the next national park, and the Revised Strategy promotes substantial areas for housing along the AONB boundary, which is unacceptable.

Dacorum Borough Council is the designated Competent Authority responsible for ensuring that no harm is done to the Chiltern Beechwoods Special Area of Conservation (SAC) within the AONB as a result of any development proposals. Much of the area comprises the

National Trust's Ashridge Estate which is a popular leisure and recreation destination and is suffering considerably from public over-use.

No attention is paid in the Revised Strategy document to the extensive discussions and ongoing work to mitigate the damage to the SAC. This damage is likely to be seriously increased by the very significant number of proposed new dwellings across the Borough, all of which will require the provision of Suitable Alternative Natural Greenspace (SANG).

As with chalk streams, the Revised Strategy is silent on this critical provision as was the Emerging Strategy. This is an extremely important omission and reflects the minimal attention paid to countryside matters in the emerging Local Plan as a whole.

This is a serious weakness in the preparation of the Dacorum Local Plan which should be rectified and reflects the lack of attention paid to biodiversity and wildlife issues. The implications of the Revised Strategy in terms of appropriate provision of green space are not addressed, and we make further specific comments below regarding water issues, the requirements for SANG and biodiversity.

Implications for chalk streams and water supply

Despite chalk rivers being a 'priority habitat' under s41 of the Natural Environment and Rural Communities Act 2006, the Revised Strategy is entirely silent on the matter of protecting the three designated chalk streams of the Bulbourne, Gade and Ver.

A significant proportion of the area proposed for housing in Dacorum is located within or in the vicinity of the upper River Gade valley, a sensitive and fragile environment. According to the Chalk Stream Restoration Strategy 2021, the Gade is the sixth most abstracted chalk river in a survey of selected chalk rivers between Dorset and Yorkshire carried out for this report, with 48% of its recharge capacity removed from the aquifer in its catchment for the public water supply.

The equivalent figures for the Bulbourne and the Ver are 28% and 32% respectively. The target figure for 'sustainable groundwater abstraction' is 10% of recharge capacity. Affinity Water is required to deliver 'sustainability reductions', i.e. reduced abstractions from the aquifer to relieve the chalk streams across Hertfordshire in its next plan period, in the second half of this decade.

The sensitivity of the Gade valley here is recognised in the Hertfordshire Water Study 2017, which finds that any development within the upper Gade catchment, northwest of Hemel Hempstead, could significantly impact water quality. Increased abstractions from the Gade valley to meet water demand generated by the proposed housing would damage the Gade still further, when the priority should be a substantial reduction in abstractions.

It appears to be reckless and unsustainable to propose large increases in population in Dacorum when the water supply situation for the plan period is clearly precarious.

Waste water infrastructure

Since the Dacorum Emerging Strategy for Growth was published in November 2020 the extent of raw sewage releases into rivers and sewage pollution in other places has become increasingly apparent. This is due to inadequate existing waste water infrastructure, which is causing huge damage to the quality of the water environment and threatening the survival of its wildlife, and poses a threat to human health.

The 2010 Water Cycle Study - Scoping Study, a document which remains in the evidence base for the new Dacorum Local Plan, was originally intended to inform the development of the growth scenarios set out in the Regional Spatial Strategy. The Study indicates major constraints to development in Hemel Hempstead in terms of wastewater treatment works and sewerage capacity, flood risk and the water environment, needing very extensive infrastructure improvements which are not specified.

The Emerging Strategy for Growth made no mention of the specific need for wastewater infrastructure improvements and no further information is provided in the Revised Strategy consultation. Such infrastructure is required to be delivered by legislation, so it is therefore essential for the protection of waterways that the new Dacorum Local Plan include provision for waste water infrastructure improvements.

Requirements for SANG

We note that as part of this public consultation, Dacorum Borough Council has issued an open 'call for sites' for potential SANG in relation to the need to protect the Chilterns Beechwoods SAC from the problems of public over-use noted above. All of Dacorum Borough is within the Natural England defined Zone of Influence (12.6 km radius from Monument Drive at Ashridge), and in late 2022, the Council adopted a Mitigation Strategy indicating requirements for SANG.

We believe it is essential that the new Dacorum Local Plan includes explicit policy regarding SANG. In particular, this should require new onsite SANG for every new greenfield development larger than 50 dwellings and it is imperative that new SANG be onsite so that residents are able to easily and conveniently access it on foot.

If SANG is not located onsite, residents will simply get in their car and drive, to either SANG elsewhere or to Ashridge, thereby increasing traffic congestion and defeating the intended purpose to deflect visitors from Ashridge. New Local Plan policy on SANG should also codify all the requirements for new SANG that are currently listed within the Mitigation Strategy.

Policy should also make clear that each proposed new SANG will be subject to the usual planning control processes. For example, the applicant should submit a planning application for change of use.

CPRE Hertfordshire
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