

**DRAFT BRAG RESPONSES**

**Question 1** *Do you agree with the conclusions reached in the Sustainability Appraisal working notes that accompanies this Issues and Options document?*

**No**

- This exercise is flawed. Whereas a particular site might be deemed to have an ‘insignificant’ negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed. This is a particularly acute problem for Berkhamsted. BRAG does not accept many of the assessments made in the appraisal but, notwithstanding that, Berkhamsted has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing as well as currently planned developments.
- Development on Green Belt cannot offer any net “environmental enhancements”, the net effect can only be negative regardless of size and the larger the development the greater the negative effect.
- Increased population would only help support the existing local economy if growth is focused within easy access of the existing centres.
- Any new facilities within larger edge of town expansions may be required for the new settlements but would not benefit the wider community and in effect lead to these developments becoming “dormitory” developments, especially around the Market Towns. This is a fact that DBC stressed at previous inspections.
- We do not agree with the conclusions made for the ‘Rejected Options’ in particular the Urban Capacity option (see Q16) and exporting growth to another council, specifically St Albans who wish to expand Hemel Hempstead without that expansion counting towards Dacorum’s numbers (see Q2)
- The cumulative effects of developments have not been assessed thus undermining any conclusions made.
- Overall the work by TRL has all the characteristics of a desk-top, tick box exercise. The assessments of individual sites are facile and lack any real analysis of the impact they may have on the specific area in which they are situated.

**Question 2** *Have we reflected all cross-boundary issues, or issues of particular importance to you or your organisation?*

**No**

- DBC have reflected the issues but co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan

**Question 3** *Have we taken account of all relevant studies and reports as part of our Issues and Options work?*

**No**

- Responses submitted to DBC regarding the studies undertaken in preparation for the Local Plan have been disregarded without any acknowledgement or open-mind. For example, BRAG produced a report highlighting the flaws in the Green Belt Stage 1 report (see Q9). The BRAG report (<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>) was accepted by Berkhamsted Town Council and submitted to DBC. Subsequently, BRAG also highlighted problems with the second stage of the Green Belt Review, but none of the input offered on either occasion has been considered. Conversely, within the body of this consultation document and the supporting evidence, landowner/development public relations propaganda has been used as factual proof of benefits that will be delivered with development.
- A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has also not been considered and should be taken into account.

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**Question 4**      *Do you agree with the suggested vision for the Borough?*

**No**

- The vision is far removed from reality. To be credible they should stand a realistic chance of being achievable. The existing infrastructure gap has not been addressed and there is no evidence from the Schedule of Site Appraisals that there will be sufficient infrastructure spend to support any substantial improvements – just the opposite. For example, ‘towns and villages have sufficient water supply’ (water is one of the major issues and can only be exacerbated by proposed development options) and ‘access to the Watford Health Campus is improved’ (the new road has had very little impact on the realities of travelling to the hospital).
- Disagree that the Watford Health Campus is an appropriate/adequate ‘vision’ for the health care aspirations of Dacorum.
- To suggest that the character of our market towns will be preserved with the escalating housing targets envisaged is laughable. The topography of many of our towns and villages make some of the aspirations in relation to pedestrians and cyclists unachievable.
- Elderly care has been omitted from the vision, as has mental health
- There is no recognition of the benefits of increased cultural provision in the Borough.

**Question 5**      *Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovingdon, or the wider countryside?*

**Yes**

- Unfortunately nothing in this consultation convinces BRAG that they will continue to be reflected in the new Local Plan.

**Question 6**      *Do you agree with the suggested objectives for the new Local Plan?*

**Yes**

- Strongly agree – all options should be robustly measured against these objectives. Planners need to demonstrate that they are ‘Living the Vision’ – or accept that it is entirely unrealistic and be honest with the local population.

**Question 7**      *Do you agree with the proposed policy coverage of the new Local Plan?*

**Yes**

- Policies identified are crucial – all options should be measured against them

**Question 8**      *Do you agree with the proposed broad approach to distributing new development?*

**No**

- BRAG agrees with the theoretical broad approach and the ‘settlement hierarchy’ adopted in the Core Strategy. BRAG would especially support an approach that confirmed Berkhamsted should continue to meet the qualities identified in Q5, but unfortunately this approach is not being implemented and only one of the options identified in section 10 comes close being able to follow the proposed approach.
- In practice the current approach is proving incompatible with preserving the character of our market towns and Berkhamsted in particular, which has received a disproportionately large amount of development to date – unsupported by any improvements in infrastructure.
- The current allocation methodology also ignores “spill over effects” into neighbouring areas such as vehicle usage from LA3 into Berkhamsted. Planned development should not be a proportional exercise when it comes to distribution.
- This matching of infrastructure and development would appear to be only achievable with large concentrated developments such as a new town or very large site rather than through much smaller ad hoc developments/sites.
- Greater consideration should be given to placing more development in villages to support local amenities and ensure their vibrancy.

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**Question 9** *Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?*

**No**

- Under plays the major role of the Green Belt which is to prevent urban sprawl by maintaining open areas between built up areas. Chosen sites should be large and self-supporting - perhaps revisit village boundaries.
- Both the stages of the Green Belt Review are deeply flawed as highlighted in correspondence from BRAG to DBC for Stage 2 and within BRAG's full response to the Stage 1 Green Belt Review (<http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf>).
- Previous conclusions on Green Belt by a series of Planning Inspectors have been ignored in favour of the flawed, confirmation biased Green Belt Reviews produced by consultants whose starting point appears to be an underlying belief that current Green Belt policy is wrong.
- Strongly agree with 5.2.6 about need to consider how sustainable proposed sites would be if developed – infrastructure, accessibility, health and wellbeing issues all crucial. Consideration of impact on character of town or village fundamental – safeguard for future generations
- Major developed sites – should be discrete sites. Adjacent Green Belt should not be destroyed by being arbitrarily lumped in with developed sites regardless of ownership of the land. If these discrete sites are already developed to a certain level then consideration can be taken to remove from Green Belt using their edge as the new boundary so as to protect undeveloped adjoining land. In essence this is what the Green Belt Review should have been - assessing which discrete parcels of already developed land can be taken out of Green Belt to provide a stronger more coherent Green Belt boundary – but failed to do.

**Question 10** *Do you agree with the proposed approach to the Rural Area summarised above?*

**Yes**

- But must retain and strengthen existing policies in respect of the AONB

**Question 11** *Do you agree with the proposed approach to selecting sites?*

**No**

- It is illogical to exclude large sites of 3000+. Even though full delivery would take longer, there would be some delivery through the earlier parts of the plan period, while the same arguments about pressure on local infrastructure applies to a greater amount for substantial sites being promoted in the Market Towns of Berkhamsted and Tring. There is plenty of evidence, viz. Aylesbury and Bicester where large scale development is phased over a period. To suggest no contribution to housing targets over the next twenty years from such an opportunity in Dacorum is unrealistic. Large site of 3000+ offer best opportunity to provide the necessary additional infrastructure.
- Strongly support maximisation of development of brownfield sites before Green Belt sites are considered. However their use should be accompanied also by an assessment of their impact on infrastructure.
- This objective is consistently contradicted/compromised by giving extra credibility and weight to Green Belt sites that can deliver in the early years of the plan period (including the first five years!).
- Inclusion of higher density developments in appropriate areas of Hemel is not addressed in any detail in the proposed approach. More emphasis on taller buildings in appropriate areas will reduce the pressure on Green Belt but only if it is considered fully before the easy option of Green Belt release.
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in our market towns.
- Gardens are "Greenfield" sites and development should be discouraged as indicated in the Govt, White paper.

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**Question 12** *Do you think that we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?*

**No**

- Nothing has changed since the 2012 enquiry. Key Transport Issues (5.5.2) ignores the fact that people will not walk/cycle to the proposed Berkhamsted developments
- Development is still being proposed in areas of Berkhamsted where, because of the topography of the town and the absence of public transport, residents use the car rather than walk or cycle. A much greater emphasis needs to be placed on the accessibility of sites to amenities by none car usage when selecting sites. The sites put forward in Berkhamsted would only increase car usage and exacerbate associated problems of congestion and pollution.
- We would support any review of parking standards which recognised the increased size of vehicles.
- While we support a review of the transport infrastructure it is difficult to see how this can be much improved in our historic market towns the roads in which were never designed for modern modes of transport - and the provision of public transport to service ridge top locations has proven to be unviable
- Some realistic modelling is needed about how we define congestion and the standards to be applied. It can now take 20 minutes to get from one end of Berkhamsted/Northchurch to the other. How many more traffic lights are proposed?

**Question 13** *Do you agree with the proposed approach to ensuring good quality design within Dacorum?*

**Yes**

- Strongly agree. It is absolutely imperative that design must be in keeping with and preserve the historic character of our market towns. Ridge-top developments are particularly intrusive and exacerbate negative factors

**Question 14** *Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix a)?*

**Yes**

- Hard to disagree with a list of titles – it is the content that matters and we haven't got that. This should be in place and consulted upon before any other decisions made about sites

**Question 15** *Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market Assessment?*

**Yes**

- Cannot see any justifiable grounds for St Albans NOT to be included

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**Question 16** Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target?

**D) 476 Urban Capacity**

- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- 6.1.14 is a dangerously misleading paragraph. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan once it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

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**Question 17**     *Do you agree with the proposed approach to affordable housing?*

**Yes**

- Affordable housing should be delivered when identified as part of site development and not permitted to be ‘bought out’ by developers, which unfortunately has been the effective default position. There is little point in having a policy on the percentage of affordable housing expected if a Council succumbs to the ‘viability argument’. Developable land ownership is likely to be in one of two categories: land in the same ownership long term; or land purchased or optioned by a developer. In the first case development value will be reduced from a ‘market housing’ level on disposal, in the second the original purchase cost will still be below market housing levels. This does not make a development unviable it merely reduces the gain from the award of a planning consent.
- Siting of affordable housing needs to pay particular attention to accessibility – with easy low-cost access to public transport, employment, retail, education, health etc

**Question 18**     *Do you agree with the proposed approach to planning for specific types of housing?*

**Yes but**

- Berkhamsted is identified as having high proportion of older population – needs provision for specialist accommodation in plans – needs to be close to centre and not reliant on car travel, cycling or walking up steep hills etc
- Berkhamsted has limited provision for one-person accommodation – needs to be addressed in plans.

**Question 19**     *Do you agree with the proposed approach to the timing of site delivery?*

**No**

- Agree brownfield sites must be released first but there are critical contradictions within this section.
- It needs to be confirmed that 6.4.2 relates to the ‘Urban’ sites [not Green Belt]
- 6.4.2 ignores the cumulative effects of small to medium sites (a recurring problem with this plan). Each site on their own may have small effect but when combined they become unbearably large for towns like Berkhamsted
- Disagree that development in town and villages can be un-phased, or that small to medium sites can be developed without placing significant pressure on infrastructure. They certainly have in Berkhamsted. The cumulative pressure which development of un-phased, small to medium sites places on the infrastructure of our towns and villages should be recognised.
- Strongly disagree with 6.4.4 – it will always be easier and more attractive to developers to build on Green Belt / Greenfield sites rather than brownfield – that is why the Government has stressed the need to develop brownfield first and DBC should comply with this guidance. The ‘good reasons’ identified in the recent Core Strategy still apply and should not be abandoned for expediency and as such this paragraph should be removed

**Question 20**     *Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?*

**No**

- Agree should cover similar area – BUT there is no mention of proximity to London and fast train routes. Given that most of the areas cited are all dormitories of London with substantial commuter numbers it is difficult to ascertain what our local economic area is.
- HMA is significant commuter area for London – how is this addressed? Just how much of a London area are we accommodating?

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**Question 21** *Do you agree with the proposed approach to meeting future jobs growth?*

**No**

- As per Q20 – how is commuting addressed in the figures. Building additional houses for commuters and exporting work needs is not mentioned
- Is all this job growth in the local area or in London? How much of our housing growth has been/ is to accommodate commuters? How much of the housing need has been encouraged by DBC and local estate agents proactively encouraging people to move to Dacorum from London?

**Question 22** *Do you agree with the proposed approach to choosing sites to accommodate future jobs growth?*

**Yes but**

- Land should not be removed from Green Belt in anticipation of need – must be proven before making such a change. Speed of technical change may alter needs and decision should therefore be delayed until need is imminent.

**Question 23** *Do you agree with the proposed approach to meeting future retail needs?*

**Yes but**

- Not convinced DBC understand the area. M&S Berkhamsted is not ‘out of centre’
- Agree retail development should be focused on Berkhamsted town centre to retain economic viability and character of this thriving market town
- However, proposed retail development at Gossoms End (Lidl) will extend retail centre along valley floor and is likely to achieve saturation of the supermarket provision in the town, while causing major congestion and pollution in an already polluted area. There appears to be no plan to mitigate this.
- Any plans for additional supermarket space either in the centre or at ‘local centres’ should be discouraged if the vitality of the town as a community centre is to be continued.
- Viability of ‘local centres’ must be proven before any acceptance as part of a development plan for any site. In the past these proposed ‘centres’ have been shown not to be commercially sustainable

**Question 24** *Do you agree the proposed approach to encouraging tourism?*

**Yes**

- Need more infrastructure to support tourism. A fine balance needs to be struck as too much could seriously harm both urban and rural environments eg Chilterns AONB

**Question 25** *Do you support the proposed approach to the natural environment?*

**No**

- Ecological corridors need to be protected. Building towards the edge of A41 will have adverse effects and drive wildlife out. This needs to be more clearly addressed.
- Removal of Green Belt for building does not enhance the ‘Green Infrastructure’

**Question 26** *Do you support the proposed approach to the historic environment?*

**No**

- Historic environment should encompass historic towns such as Berkhamsted – identifying limited Conservation Areas whilst destroying the surrounding environment will have detrimental effects on the town as a whole and its contribution to the goal of increased tourism

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**Question 27** *Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?*

**No**

- The approach is proposing large releases of Green Belt and productive farm land. It also threatens ancient woodland, while doing nothing to prevent pollution.
- National guidance states that development in areas at risk of flooding should be avoided – but sites with flood risk are included in the site appraisals and recommended for development
- SFRA not yet completed – needs to be in place before decisions on sites made
- Evidence is continually ignored by building on and proposing sites in less accessible areas, AQMAs, and those with a flood risk. Actions do not follow policies and ameliorating actions are in most case inadequate e.g. Green Travel Plans.

**Question 28** *Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?*

**No**

- Agree in that it recognises that main source of pollution comes from traffic emissions BUT
  - this needs to be taken into account when suggesting development alongside major roads such as A41
  - also increased traffic generation in Berkhamsted town centre and congestion on A4251 caused by large sites on ridge tops and at a distance from the town centre converging on the retail and service sector of the town
  - threatens ancient woodland rather than planting more trees which would actually help reduce the impacts of climate change
- Local Plans have made it worse by
  - building in areas which are not easily accessible by walking, cycling or public transport such as ridge top locations in Berkhamsted thus encouraging car usage
  - building and proposing sites in AQMA's



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**Question 29**     *Do you agree that we have covered all relevant issues relating to physical infrastructure?*

**No**

- Assumption that large-scale growth makes delivery of infrastructure easier is misplaced – depends on the site and the viability – blanket assumptions should not be made
- Agree with principles of transport infrastructure in 9.1.1 – sites must meet this to be selected – where identifiable problems in Site Appraisal should disqualify site for consideration. Roads required for the development of new sites cannot be regarded as infrastructure improvements for the community as a whole
- Suggested public transport options for proposed sites are not feasible
- There is a large infrastructure deficit already without additional development pressures and there is no guarantee/evidence that this will improve.
- Water and sewerage – Proposals are not environmentally sustainable in particular in respect of water. The demands of new residential development in this respect are contrary to the ‘Vision’ for the Borough
  - The environmental consultants make reference to there being a problem with water supply, but do not state that what is proposed is unsustainable. At the time of responding the River Bulbourne is dry and Tring reservoirs are at the lowest level residents can remember. These feed the canal system and we are at the highest point between London and Birmingham. In addition water flow in the River Gade is very low. Both the Gade and Bulbourne are chalk streams which are protected under the Water Framework Directive - and its translation into British Law. Any increase in housing in the current situation will lead to a further lowering of the aquifer and the Bulbourne never returning and the Gade drying up . Dacorum has just spent millions of pounds improving the Water Gardens in Hemel Hempstead which are dependent on the Gade for their water supply.
  - It has been suggested by consultants that water can be brought to Berkhamsted providing mains capacity is increased but this would appear to depend on there being sufficient aquifer capacity in the River Colne catchment area, which there is not, and water being imported from East Anglia. The Anglian Water region is under severe stress and was in supply deficit in 2015. Surplus water for other regions is unlikely.
  - Hence any build in Dacorum before major infrastructure water systems have been put in place will result in significant damage to our environment locally and are unsustainable. The Region requires a water ring system that will move water from the NW of England to the South. Rather than accepting that it is up to third party utility suppliers to meet demand, Dacorum should be robustly arguing that until that sustainable water is available, no significant building of new houses should occur.

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**Question 30** *Do you think that we have covered all relevant issues relating to social infrastructure?*

**No**

- Education
  - Assumption that facilities can be expanded, or new facilities built over-optimistic – for example Ashlyns School is nearing capacity but another secondary school in Berkhamsted would be unviable
    - site appraisals frequently state that they will enable the provision of school places and this is totally unrealistic
- Health
  - Local Urgent Care facilities have reduced recently in Hemel Hempstead – not addressed
  - Mental Health service omitted entirely
  - Dementia care not addressed
- Community Facilities
  - Hemel Hempstead’s concept of neighbourhoods is appropriate – it is not appropriate to impose this concept on the Market Town of Berkhamsted by developing large ‘commuter’ sites on the periphery of the town – with suggested local centres.
  - It is vital that the existing community facilities so importantly situated at the centre of the town continue to be supported for the well-being of residents.
  - Suggestions that facilities on the peripheral sites will be of benefit to existing residents is misplaced – they will weaken the vitality of the hub and diminish both the economic success and the community cohesion clearly evident in Berkhamsted
- Culture
  - Dacorum lacks a significant cultural space such as a concert hall/theatre facility. In renegeing on past promises to replace the Pavillion the Council have argued that there is sufficient cultural provision in the large conurbations surrounding the Borough, Milton Keynes, Watford etc. The Borough is going to grow. Council emphasise its importance as a sub regional centre. It aspires to a high quality of life for inhabitants. The lack of a cultural centre can be ignored no longer and 9.2.8 is inadequate in describing the ambitions of the Council.

**Question 31** *Do you think that we have covered all issues relating to green infrastructure?*

**No**

- Agree that “the quality of green spaces in Dacorum attracts people and families to live, work and play here” – Therefore how does building on all the Green Belt land surrounding Berkhamsted comply
- Concreting over a large area and providing a play area or pitch does not constitute providing open space
- Leisure and recreational spaces need to be accessible to the local population without generating additional car journeys and adding to emissions
- Berkhamsted has a recognised deficiency of green open space within the urban area. Much use is made therefore of adjacent sites, currently within the green belt, many of which are being offered for future development. This green open character needs to be retained

**Question 32** *Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?*

**No**

- Need to see some concrete estimates of infrastructure costs to cover accumulated deficit to date and development options.
- Suggesting Crowd Funding to fund infrastructure improvement or relying on residents to manage local woodland, community facilities etc is not a sound proposal - especially in a period of economic uncertainty and increasing inflationary pressures
- Concerned that throughout the document Hemel Hempstead seems to have priority when it comes to infrastructure provision despite the fact that Berkhamsted has highest rate of CIL and currently a higher build rate.

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**Question 33** Do you agree that the three growth levels proposed are the most reasonable to consider?

**No**

- There is an inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.
- DBC figures ignore the major extension to East Hemel that is proposed by St Albans. Notwithstanding St Albans refusal to co-operate at this time, figures from that development should be incorporated which should amount to a minimum of three years housing supply and with increased density numbers in appropriate areas would bring the numbers up to or very close to the ‘draft Government figure’.
- Claims that Option 3 will have to be adopted if “the Government’s new draft standard formula for assessing need (were) to be applied to Dacorum” is a gross misrepresentation of the facts. The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum’s plan immediately it becomes more than 5 years old. The consultation paper is not designed to punish authorities working on updating their plans, indeed consultation paper clearly offers a 2 year grace period while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years, which could in theory take the Dacorum plan to 2025 if the new plan was adopted at the last possible moment. For the sake of clarity, BRAG is not suggesting adoption of the plan should be left the last date but simply offer it as an example.

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**Question 34** Do you agree with the rejection of the following (see page 69 of consultation document) growth levels?

**No**

- ‘Urban Capacity’ option should not have been rejected,
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

**DRAFT BRAG RESPONSES**

**Question 35** *Has the Council considered all reasonable alternative levels of growth?*

**No**

- Have not considered the rejected options properly.
- It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release. Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Core Strategy Inspector was not convinced that DBC had fully assessed housing need based on robust household projections, which is why he requested that work to be completed as part the early review. However, the Inspector was also at pains to stress at the public hearings that those numbers are NOT and do NOT have to form the housing target. They simply make up part of the evidence base which also includes infrastructure, environmental, physical, Green Belt etc constraints which could necessitate a lower target being set. Conversely, if no constraints apply, the Inspector suggested that the Local Authority may be able to set higher targets and possibly ease pressure in neighbouring regions. This point has recently been confirmed in the recent DCLG “Planning for the right homes in the right places: consultation proposals” with paragraph 9 stating that *“Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need.”* Notwithstanding the fact that BRAG has grave reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point, particularly given the Governments recent strong commitments to preserving the Green Belt.
- One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that. Just by way of an example, simply having an average of just 0.1 person extra per household compared the figure used in projections for 2036 would bring the SHMA’s ‘locally assessed needs’ down to the ‘draft Government numbers’. In short, growth options should be dependent on a realistic assessment of capacity and the suitability of the sites proposed within the recognised constraints as should the allocation of development. It should be recognised that predictions of need are subject to quite large margins of error given the various assumptions on which they are calculated.

**Question 36** *Do you support the proposed locational principles?*

**No**

- Other sections of this consultation suggest that to support the 5 year housing land supply would immediately require Green Belt releases. Obviously 5 year housing land supply needs to be located but the consultation document indicates that DBC have ill-conceived ideas of how to do this. The headline principle should include the wording, “within urban capacity”

**DRAFT BRAG RESPONSES**

**Question 37** Do you agree with the rejection of the following (see page 73 of consultation document) growth distributions?

**No**

- Export to another Council area should not be rejected, specifically the St Albans land east of Hemel
- Co-operation with St Albans was key issue in Core Strategy Inspection. The Inspector’s report requested a partial review containing three elements – “(a) household projections; (b) the role and function of Green Belt... and **more significantly**, (c) the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum”. Throughout the public sessions the Inspector consistently pointed to St Alban’s land east of Hemel as appropriate land for outward expansion of Hemel with a large portion of the dwellings justly counting towards DBC’s numbers. DBC have tried to engage with St Albans but that council’s refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. As the Inspector stated this should have been the most “significant” part of the partial review but DBC have simply ‘parked’ the issue for this consultation. Contribution towards Dacorum Housing target from Gorhambury development should be included in this plan
- Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that

**Question 38** Has the Council considered all reasonable alternatives for distributing growth?

**No**

- There are many more permutations for growth distribution, but clearly DBC have carried out a simple arithmetic exercise and restricted the options offered to fit with favoured promoted land sites.
- Dacorum planners made it abundantly clear when developing the current Core Strategy that anything over the current housing target in Berkhamsted (1180 for 2006-2031) could not be sustained on infrastructure grounds. Those reasons still hold – the only thing that has changed is that pressure on infrastructure has increased.
- As admitted by DBC representatives at the consultation exhibitions, the growth distributions offered were a simple arithmetic exercise ignoring such critical planning considerations as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first **5** years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments,
- Such disparities within Dacorum must be taken into account when assessing development numbers and site options.
- Hemel Hempstead, Berkhamsted and Tring have quite different topographical characteristics and infrastructure constraints/needs which should be recognized when considering housing allocations between them. Housing distribution should not be a proportional arithmetical exercise. Development should go where it can be most suitably placed and least harmful. Any additional development over and above that already planned for in Berkhamsted would be disastrous given the town’s infrastructure constraints and current deficits.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**DRAFT BRAG RESPONSES**

**Question 39** *Is Option 1A your preferred option for delivering the growth needs of the Borough?*

**No**

- This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).
- No consideration has been given critical planning considerations such as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- Berkhamsted should most not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**Question 40** *Is Option 1B your preferred option for delivering the growth needs of the Borough?*

**Yes**

- This is the best of the options offered and concentrates the growth on Hemel Hempstead which as a new town is far better equipped/designed to grow. Forcing massive growth on the Market Towns is not acceptable given the infrastructure limitations and would destroy their unique nature.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and excessive growth in Berkhamsted proposed in all but one of the options on the table does not do this. Rather than being made to feel guilty, residents of Berkhamsted should be proud to help “protect the town’s historic character and setting” and feel proud for the contribution the town has **already** made to the housing needs of Dacorum. Berkhamsted should most definitely not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- The Core Strategy Planning Inspector was in full agreement that the focus for development should be on Hemel. This option concentrates development on Hemel and provide best option for new supporting infrastructure.

**DRAFT BRAG RESPONSES**

**Question 41** *Is Option 1C your preferred option for delivering the growth needs of the Borough?*

**No**

- This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).
- No consideration has been given critical planning considerations such as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- Berkhamsted should most not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**Question 42** *Is Option 2A your preferred option for delivering the growth needs of the Borough?*

**No**

- This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).
- No consideration has been given critical planning considerations such as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- Berkhamsted should most not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.



**DRAFT BRAG RESPONSES**

**Question 43** *Is Option 2B your preferred option for delivering the growth needs of the Borough?*

**No**

- This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).
- No consideration has been given critical planning considerations such as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- Berkhamsted should most not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**Question 44** *Is Option 2C your preferred option for delivering the growth needs of the Borough?*

**No**

- This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).
- No consideration has been given critical planning considerations such as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- Berkhamsted should most not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**DRAFT BRAG RESPONSES**

**Question 45** *Is Option 3 your preferred option for delivering the growth needs of the Borough?*

**No**

- This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7).
- No consideration has been given critical planning considerations such as recent and on-going build against targets and local impact given different topographies and (inadequate) supporting infrastructure.
- The current Core Strategy covers the 25 year period 2006 to 2031 and the technical appendix to the latest “Authority Monitoring Report & Progress on the Dacorum Development Programme” reveals that in the first 5 years (2006-11) of the plan Berkhamsted **delivered 10 years** worth of new housing stock and by 2016 the rate of development had **exceeded** Core Strategy targets by a massive **34%**. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development. Development in Hemel has been at a pretty constant rate over the first 10 years of the CS, unfortunately at rate some **21% below** the target figure. So, **all** the shortfall that DBC claim we need to pick up in the new plan comes from failure to concentrate on the Hemel developments.
- Berkhamsted should most not be punished because the town has developed at a faster rate than required by the plan. Just like a pint pot, once it is full it is full and adding extra just makes for one almighty mess.
- As the Planning Inspector stated in his Core Strategy report, development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this.
- Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries” (letter to MPs from Minister of State for Housing and Planning – June 2016) – and the commitment to protecting Green Belt has been repeated many times, including by the Chancellor in his recent budget speech. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted and under Government policy cannot lead to Green Belt boundary changes.

**DRAFT BRAG RESPONSES**

**Question 46** Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals?

**Yes**

**General Comment:**

This exercise is flawed. Whereas a particular site might be deemed to have an ‘insignificant’ negative impact, the sites when combined could have a significant negative impact on, for example, water, pollution etc. It is the cumulative impact of development past, present and that proposed in the immediate **and** neighbouring area on sustainability which should be assessed.

NB this is particularly the case for Berkhamsted which has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments.

BRAG believes that DBC are ‘putting the cart before the horse’ in offering specific Green Belt sites for consultation in the draft Schedule of Site Appraisals.

In order for the Planning Inspector to find the current Core Strategy sound, it is true that DBC had to commit to an early “partial review” which needed to include an assessment of “the role and function of the Green Belt affecting Dacorum, including long term boundaries”, but the Inspector also made it clear that “more significantly” the review had to assess “the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum.”

In the end, DBC surprisingly decided to form a whole new plan rather than just completing the required partial review and, although ‘parking’ the issue of St Alban’s proposed expansion of East Hemel, pressed ahead with a Green Belt review (stages 1 & 2) that has proved to be a deeply flawed process (see <http://www.nosouthberkhamstedconcept.com/wp-content/uploads/2014/06/BRAG-Analysis-of-the-Green-Belt-Review-undertaken-for-DBC-by-SKM-final-version.pdf> for a full analysis of stage 1). In short, both of the DBC commissioned papers provide text book examples of ‘Confirmation Bias’ from a pro-development starting point and academic arguments against the effectiveness of Green Belt in general.

BRAG believes that any Green Belt review should have been carried out ‘blind’ of any ownership issues. If some discreet areas of land were found to have failed to meet the Green Belt assessment, then a boundary change could be recommended, but only for the specific area that failed the test. There can be no justification for removing adjacent Green Belt land just because it comes under the same ownership and is being promoted for development. But this is exactly what the Green Belt review appears to set out to do.

The proposed excessive development of Berkhamsted is driven by the demand of developers to build where they can make most profits, but Government policy is clear that demand for housing cannot change Green Belt boundaries. BRAG contends that, in accepting the Green Belt review as written, DBC are complicit with developers in trying to force Green Belt boundary changes simply on the basis of demand.

A full impartial review would have identified defensible “long term boundaries” and that should have been put out for consultation **prior** to assessing specific sites and prior to this full New Local Plan Consultation. Given central Government’s continued commitment to protecting and strengthening the Green Belt, BRAG believes that this would have been a more logical process and is what the Core Strategy Planning Inspector intended.

However, notwithstanding these objections to the process BRAG does have feedback on the sites relating to Berkhamsted and Northchurch.

Suggestion throughout that provision of housing “could help the local economy and encourage provision of local services” and that development of sites “could help to maintain community vibrancy and vitality” totally ignores the topography of the town. More houses likely to mean quite the opposite with increased congestion, reduction in commercial viability of existing commercial and retail centre of the town, a diminished attraction to tourists and a change from a successful vibrant market town to a soulless commuter enclave with little community cohesion.

Proposed Approaches are set out – and then ignored in the selection of sites for development

There are several issues that have not been addressed before sites are identified –

- DBC list of suggested policies for the new Local Plan needs to be fleshed out before sites can be judged against them
- Highways – LTP needs to be published to analyse in detail any proposals
- Flooding – SFRA not completed

## DRAFT BRAG RESPONSES

At the consultation stage of the Core Strategy, Dacorum Planning Department make a number of strong statements of principle relating to the Berkhamsted Spatial Strategy which are being overturned in the current proposals without reason or explanation. Many of the sites now proposed are specifically identified in the Berkhamsted Vision Diagram as being “Sensitive Valley Sides”.

The Emerging Core Strategy states:

### Built Character

- The open valley sides would be particularly sensitive to the effects of new development.
- Summary of key principles include – suburban housing neighbourhoods on upper valley sites – detached housing on large plots at very low densities. New development should be low density.

### Key views

- The UDA highlights that the valley form allows for a number of scenic views across the valley sides to and from the surrounding countryside. There are also several strong view corridors within Berkhamsted town centre, especially along the canal and at the opposite ends of the High Street. Development is generally visible off the crest of the valley side, except at Shootersway. The main routes into Berkhamsted and Northchurch provide attractive ‘green’, semi-rural and suburban gateways.

### Berkhamsted Vision

- New development will be high quality, sustainable and locally distinctive that respects and protects the built and natural heritage of the town, the canalside environment, and the character of neighbourhoods.

### Looking after the Environment

- The settlement is linear in form and follows the valley topography. New development should respect this broad structure. The open valley sides and ridge top locations are especially sensitive to new building and development in these locations will not be supported. The Urban Design Assessment (UDA) stresses, the need to safeguard views across the valley (such as up the dry valley from Berkhamsted Castle), and in controlling building heights as you rise up the valley sides. The A41 Bypass will not represent the natural southern boundary to the town.
- The UDA sets out a range of principles that we will take forward that will help guide development in the town and protect its character (see Table 1). Appropriate forms and densities of housing development are sought, including housing types and building heights. Progressively lower density development is encouraged further away from the high-density town centre and conservation area. This approach will reinforce the existing character and quality of areas. Particular emphasis is given to protecting the lower density on the outskirts of Berkhamsted as it represents a transition from town to the open countryside of the Green Belt.

### Social and personal welfare

- Berkhamsted should accommodate moderate levels of growth given it is the second largest settlement in the borough, the need to maintain the vitality of the settlement, and to ensure sufficient affordable housing is delivered. Its strong character, setting, and school capacity restrict the extent of growth. Most of the growth can be met within sites in the existing urban area.

### Economic prosperity

- Berkhamsted town centre has a vibrant mix of shopping, services, food and drink outlets and leisure facilities, all set against a High Street of high quality historic buildings. This provides it with a strong character. The UDA supports protecting its historic character, encouraging a mix of uses, and promoting increased densities given its sustainable location. The Saturday street market adds to its attraction together with a well-developed evening economy that draws visitors from a wide area. A compact centre needs to be maintained with a lively range of uses, given the elongate nature of the settlement. This will help protect the key district shopping and service role of the centre.

Importantly the Core Strategy (endorsed by Councillors) rejected a number of sites in Berkhamsted giving detailed reasons for rejection – yet just a few years later Dacorum planning are ignoring these reasons without explanation and putting these very sites forward for development. The reasons previously given for rejection still hold good and itemised under each of the sites below.

**DRAFT BRAG RESPONSES**

**Comments on individual sites**

**Be-h1 Land south of Berkhamsted**

**Core Strategy rejected this option for the following reasons**

- Strong countryside/Green Belt boundary.
- Development would be highly visible from this prominent ridge top location.
- Erosion of buffer between bypass and existing built up area.
- Poor relationship to town centre services and facilities, employment land and station.
- Important transition area between the town and open countryside would be damaged.
- This could also set a precedent for further development of land southwards to the A41.
- Not well related to existing housing.
- Visual impact on important gateway to town from A416 and A41.
- Proximity of A41 bypass.
- Potential impact on the setting of Ashlyn’s Hall.

**In addition BRAG makes the following objections**

This land has been promoted many times before and the largest parcel within Be-h1 has been robustly rejected by previous Planning Inspectors – “The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.” Nothing has physically changed

Current Site Appraisal raises significant issues that contravene the Dacorum and Berkhamsted Visions – extracts below

- Substantial loss of Green Belt land and major southward expansion of the town on the open upper valley sides up to the A41.
- Impact on the Green Gateway into the town – impact on transition area from urban to countryside
- The land is not well related to existing services and facilities in the town centre.
- Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Located near A41 – noise levels could affect health and wellbeing even with the proposed acoustic bunds in place
- Large-scale development will place significant pressure on local infrastructure, particularly schooling and the local highway network.
- The ability of these roads to accommodate additional traffic should be tested, particularly Swing Gate Lane and any potential to upgrade it.
- Capacity of Shootersway / Kingshill Way junction and other local junctions will need to be confirmed, especially given cumulative impact of existing and other promoted development. Sustainability

Site Appraisal acknowledges that the distance from key facilities and services and its valley ridge location would discourage movements by foot or cycle

Site Appraisals all negative issues – mitigation relies on

- The proposal offers opportunity to create a new planned neighbourhood expansion of the town with a range of associated local services and facilities. It is of a size to deliver larger-scale infrastructure and contribute to improving transport links through the creation of an east-west link road (connecting Swing Gate Lane with Chesham Road), although this will need to be tested. It also allows potential to secure a range of social, leisure and community facilities.

**DRAFT BRAG RESPONSES**

BRAG gave evidence at the Core Strategy showing that the so called benefits are unlikely to materialise, are not sustainable or are simply required to facilitate the new development itself, giving no benefit to the wider community and indeed would pile extra stress on the already creaking infrastructure. In particular:

- Proposed east-west link is promoted as benefit to the wider community. However, at the Accessibility session of the Core Strategy Hearing the Inspector accepted the conclusions of all attendees (including DBC and Herts County Council Highways Department) that the 'link' could not work as promoted by the developer and was simply required to facilitate the proposed new development. As such it cannot be accepted as benefit for the community as a whole and is shocking that it appears as such in a DBC site appraisal. It is likely to generate rat runs – cutting out road system around Chesham Road (which is one-way for the majority) and Shootersway – leading to unintended consequence of massive congestion as cars are forced down Swing Gate Lane – which does not have the capacity – and then additional traffic on all the Hall Park estate roads as cars seek to avoid traffic jams with A4251
- Additional 2000 cars (c12,000 car movements per day) – contrary to local plan policies and creating increased greenhouse gas emissions
- Parts of this ridge top location would be highly visible from AONB land and intrusive
- Commuter estate – lack of community cohesion – no contribution to vision of a 'sustainable and vibrant market town'
- Suggestion of new primary school – rejected by DBC at Core Strategy Inquiry. Does not fit with education strategy.
- Secondary school places inadequate
- Affordable housing – cut off from town and all facilities – requirement for car – will not generate vision of 'inclusive community'
- Not appropriate siting for growing elderly population An increasing elderly population will have more reliance on cars etc and the distance from town and all vital facilities will be a key factor in their integration into the community or isolation from it.
- Previous suggestions to improve traffic flow in Swing Gate Lane by banning parking totally unfeasible and detrimental to community.
- Additional dangers of steep roads in winter. In recent years, bad winters have become a regular occurrence and, in some cases, freezing conditions have lasted for several days. Most roads leading south out of the valley were not cleared or treated and buses either found them impassable or proceeded with great difficulty. Refuse collection had to be cancelled and four wheel drive vehicles had difficulty in coping. The inaccessibility of the hills caused many drivers to abandon their cars on the London Road, exacerbating travel problems. The weather-related accessibility problems for any developments on the valley ridge will require some form of snow clearance programme. This definitely has not happened in recent years mainly on the grounds of cost and once, we believe, when there was a national shortage of salt. We can find no evidence that this particular issue has been addressed.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG's traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.
- Suggestion of 'bus loop' not viable solution as clearly demonstrated at Core Strategy Inspection. Berkhamsted bus routes have decreased in recent years. Would not meet requirement for 1000 home to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- **Important issue** – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will commute to work or make their journey to the station by private car."
- Berkhamsted railway station and commuter line to Euston is already at full capacity.
- Suggestion of local services and facilities shown to not to be viable at last Core Strategy inquiry – BRAG has letters from commercial surveyors relating to local retail provision not being a sustainable option
- Suggestion of local employment opportunities in 'local centre' or business units – generate more car journeys – not viable anyway

**DRAFT BRAG RESPONSES**

- GP / health provision – town struggling to meet current demand. National shortage of GPs – unlikely that a new practice would be established on South Berkhamsted site – significant distance to current practices
- Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted
- Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site
- Development of site threatens ancient woodland (Long Green), while environmental policies suggest this would be an ideal area to plant more trees and expand existing woodland rather than creating more pollution.
- Suggestions of managed woodland doubtful – who would have responsibility
- Area of Archaeological significance affects part of the land
- Site appraisal says the ‘Potential linkages with B-h2 could be explored’ – would exacerbate all the problems and block wildlife corridor even more

**Be-h2 Haslam Fields, Shootersway**

**Core Strategy identified the following reasons against development on this site**

- Site is insufficient on its own, but could be phased with other land.
- Site is part of the open transition area between the town and the wider countryside.
- New building could set a precedent for further development of land southwards to the A41.
- Site is too small to offer scope for additional town-wide leisure space.

**In addition BRAG makes the following objections**

- Identified in Site Appraisal as - Located at a distance from the town centre which would discourage walking and cycling – in addition the gradient between the town centre and the site may make walking and cycling difficult
- Cumulative negative impact on Berkhamsted infrastructure with little contribution
- Likely to become another commuter area contributing nothing to vibrancy and vitality of the town
- Increased car use and growth in level of greenhouse gas emissions
- Poor and possibly dangerous access onto Shootersway and congestion issues given adjacent development at LA4.
- Inadequate capacity of Shootersway - the impact of any development on road capacity must be assessed alongside the cumulative impact of ongoing development, that already planned for and any other proposed development along Shootersway.
- Located near A41 – noise levels and car emissions could affect health and wellbeing
- Suggested public open space at rear of site – unsuitable as close to A41 noise and car emissions – also closes off wildlife corridor
- Affordable housing too far from town centre and facilities/service – would require car – not contribute to community cohesion or sustainable prosperity
- Continues ‘domino effect’ of development along the ridge top that DBC was warned about
- Loss of playing pitches – suggested replacements even further from town centre on other side of A41 – increasing car journeys even more
- Potential archaeological remains
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

**DRAFT BRAG RESPONSES**

**Be-h3 Land at Ivy House Lane**

**Core Strategy rejected this option for the following reasons**

- Proximity to Chilterns AONB.
- Strong countryside/Green Belt boundary would be breached.
- Impact on valley sides and important dry valley location.

**In addition BRAG makes the following objections**

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Only separated from AONB by Ivy House Lane a single-track road and was rejected in past inquiries
- Site is not only visible to the immediate surrounding residents but also distant views from as far away as four miles down the valley at Westbrook Hay and other strategic vantage points
- AONB currently separated from development at Hunters Park by this open agricultural area
- Plot rises from Ivy House Lane in east to Hunters Park – no screening could be effective
- Development of the site will result in loss of valuable regularly cultivated arable land where over at least the past 40 years cereal/rapeseed crops have been harvested annually
- Access is single track road with pinch points that cannot be widened (1800 car movements per day) – leading into a railway bridge and narrow congested roads to the south, or a narrow lane to the north leading to a junction with The Common at a point near to a hazardous junction.
- Traffic to the town and station would then flow south down Gravel Path which is already a busy road used heavily in rush hours and constantly during the day, or along to New Road, entering the town via single lane bridges.
- Suggested bus route runs two buses per day in each direction – not a viable alternative to car usage
- No public footpaths in the vicinity affecting walking to the nearest bus stop (more than the 300m away stated) and certainly no safe access for schools and children
- Poor accessibility to schools and all other facilities
- Water supply in the area has been subject to frequent repairs along Gravel Path. The road has been closed 3 times in Autumn 2017 for more than 4 days on each occurrence as well as part closed for other repairs. The water supply has been cut off without notice at night on 3 occasions during the Summer months of 2017, apparently due to low pressure.
- Residential development will destroy a natural habitat for local wildlife such as deer, muntjacs, badgers, hares, bats, ducks, pheasants and many bird species (owl, woodpeckers, thrushes, blackbirds, robins, swallows, heron) and the effect of pollution on night flying fauna should not be ignored.
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport. There is no dedicated cycle route near the site
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.



**DRAFT BRAG RESPONSES**

**Be-h4 Land between Durrants Lane / Bell Lane / Darr's Lane (two sites)**

**Core Strategy rejected this option for the following reasons**

- Strong countryside boundary.
- Impact on landscape/Chilterns AONB.
- Impact and visibility of development on valley sides.
- Poor relationship to town centre services and facilities, employment land and station.

**In addition BRAG makes the following objections**

- Fails to meet Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided highly unlikely
- Suggestion that it is relatively close to shops at Northchurch risible – especially as the same Site Appraisal points out the steep gradient and distance
- Parking at Northchuch already insufficient – no capacity for additional cars from ridge top
- Exits onto Shootersway an already overstretched road at a point near to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Suggestion of ‘bus loop’ therefore not viable solution. Berkhamsted bus routes have decreased in recent years. Would not meet requirement to reach employment, schooling etc in rush hour or have any significant impact on car journeys
- Site falls within area of Archaeological significance
- Adjacent to Chilterns AONB
- Suggestion of potential new primary school – not part of Berkhamsted education policy
- Lack of secondary school capacity – Ashlyns School
- Same arguments on accessible housing – distance from facilities and services
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

**DRAFT BRAG RESPONSES**

**Be-h5 Land at Lockfield, New Road, Northchurch**

**Core Strategy identified the following reasons against development on this site**

- Site is insufficient on its own, but could be phased with other land.
- Some distance from the town centre.
- Next to the Chilterns AONB.
- Site is too small to offer scope for additional town-wide leisure space.
- The canal bridge on New Road is narrow and results in poor pedestrian access to local facilities.
- Visually prominent site.
- Proximity to railway line.
- Impact on setting of the canal.

**In addition BRAG makes the following objections**

- Close to canal - undermines Berkhamsted Vision “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne”
- Close to Northchurch AQMA
- Traffic congestion at junction of North Road with Northchurch High Street will be exacerbated
- Parking difficulties and concerns for safety of children attending St Mary’s School – recent death of nine year old girl in road accident
- Noise from railway
- Distance from town centre services and vital facilities

**DRAFT BRAG RESPONSES**

**Be-h6 Land adj. to Blegberry Gardens, Shootersway**

**Core Strategy identified the following reasons against development on this site**

- Some distance from the town centre.
- Important transition area between the town and open countryside.
- New building could set a precedent for further development of land to the A41 bypass.
- Site is too small to offer scope for additional town-wide leisure space.
- Very close to the A41.

**In addition BRAG makes the following objections**

- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - suggestions that residents would walk to and from the town on any pathway provided through Bearroc is absurd
- Situated at ridge top location at a distance from employment, retail, health and community services.
- Negative impact on adjacent AONB and concern for existing Tree Preservation Orders
- Site of archaeological significance
- Not recommended for removal from Green Belt
  - Exits onto Shootersway an already overstretched road at a point opposite to the large new development – Bearroc [Taylor Wimpey]. One of the major concerns of the Council in granting permission for development at Bearroc was the traffic that would be generated. Any additional development in this area will exacerbate the problems of traffic congestion and air pollution. Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- No public transport within reach. Suggestions that this development would increase the viability of new public transport provision is unrealistic. Little likelihood of commercial viability for even a few services per day and majority of journeys would be made by car
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.

**DRAFT BRAG RESPONSES**

**Be-h7 Land at Bank Mill Lane**

**Core Strategy rejected this option for the following reasons**

- Encroachment of the urban area along the valley bottom and into adjoining open countryside.
- Distance from the town centre services and facilities, employment land and station.
- Impact on setting of the River Bulbourne.
- Reduction in the degree of separation between the town and Bourne End

**In addition BRAG makes the following objections**

- Expansion of town to east - would significantly alter Gateway to Berkhamsted
- Located in Berkhamsted Conservation Area
- Impact on adjacent AONB
- Risk of flooding identified in assessment
- Distance from town centre – walking or cycling route to town adversely affected by any additional traffic to/from South Berkhamsted
- Suggestion of provision of local play space – edge of town not a practical site
- Adjacent site delivered NO affordable homes – suggestion that this site will deliver 20 affordable homes ....
- Suggestion of specialist elderly person’s accommodation on site – at a distance from the town centre facilities and services - residents won’t be walking and cycling to the town

**Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane**

- Site appraisal recommends exclusion from further assessment and retain as green belt
- Site lies within CAONB – large-scale development opportunities to be avoided
- At a distance from immediate urban edge and would extend town further into countryside
- Close to ancient woodland
- Loss of leisure facility
- Ridge top - Poor accessibility to employment, retail, health and community services – no public transport - increased car usage
- Impact of additional traffic onto Shootersway and potentially in Northchurch - Additional traffic created by the site could add to existing problems in the AQMA at Northchurch
- Fails to meet Dacorum or Berkhamsted Vision
  - facilities and services not accessible
  - Public transport cannot be used and provision for walking and cycling not viable - too far for residents to walk to and from the town
- Sustainable travel aspirations are unrealistic. Cycling is the least popular mode of travel and, during BRAG’s traffic surveys, it was very rare to see a cyclist, especially ascending the hill. With long, very steep gradients, some of which are 1:11, cycling is accepted not to be a realistic alternative form of transport.
- Walking is a popular mode of travel for those living within one mile of the town centre or the railway station, currently, 12% of commuters walk. In the DfT 'Sustainable Travel Towns' initiative, walking trips per person grew by some 13%. If applied to Berkhamsted, the numbers walking would increase to just 13½% but again the steep gradients would not promote walking in this site. We accept that bus travel offers the best hope for reducing car use but many of the ideas put forward in the Strategy Document and supporting papers do appear over-optimistic. A large proportion of Berkhamsted resident already live within ten minutes of a bus stop and, generally, the services to the town centre and further afield are good but usage, for any purpose, remains low.