



## **Response to questions in EMERGING CORE STRATEGY: PART I, BOROUGH VISION**

### **Question 1**

Visions are nice to have but to be effective they must be realistic and achievable otherwise they merely provoke cynicism and fall into disrepute. Whilst in a utopian world it would be difficult to disagree with the aims expressed here we feel that many will be impossible to implement in reality and find some quite contradictory. We refer to some specific points from the vision:

#### ***Infrastructure provision:***

The Berkhamsted infrastructure cannot support the current level of development let alone that envisaged. Current deficiencies include the drainage and sewage system, water supply, electricity overloads, parking facilities, traffic congestion and local medical and elderly care. There is, in addition, a well documented shortage of public Open Space in the town which is well below other comparable locations.

#### ***Transport:***

The promotion of an integrated transport system in the town is a good idea but will be difficult to implement in Berkhamsted given the topography of the town. All retail outlets are concentrated in the centre of town and there are no bus services linking suburbs to the town centre. Our suburban roads are congested, and are reduced to single track in many locations due to on- street parking. There would appear to be a lack of funds to correct these issues.

#### ***Conserving and enhancing the countryside, Green Belt and the Chilterns AONB etc:***

Wholly agree. We are opposed to any further erosion of the Green Belt and development in the AONB. We would like guarantees on this.

#### ***Focusing on the re-use of urban sites:***

Yes, but this should not rely on garden infilling. We urge Dacorum to use its powers under PPS3 to stop this or make special (restrictive) planning provisions for garden infilling. We feel it is imperative that a distinction is made in planning polices between conventional brownfield and garden/brownfield sites. It is just as important to state where one does *not* want development as it is to identify where one does want it. See also our comments below on biodiversity.

#### ***A focus on high quality design:***

Yes. We would wish to see an end to copy-cat/one style fits all development which is plaguing our town and threatening the conservation area. We would like to see some clarification on the issue of 2.5 and 3.5 storey buildings which places more emphasis on the height of buildings. The same applies to dormers which are rapidly changing our townscape. New Lodge provides a vivid example of the former while a recent application for Manor Street typifies the latter.

***Ensuring the efficient use of land, whilst maintaining the variety and character of the town and villages:***

This will only be achieved if the SPG character areas are given greater emphasis and definition. Many have been severely eroded by garden infilling and a failure to effectively implement relevant policies and SPG's. The SPG's are essential if speculative development and revised (higher) density categories as specified in the Urban Design Checklist are not to erode the character areas of Berkhamsted and should be raised in importance in the development management policies. Recommended density levels well below 30dph need to be specified very clearly where they are appropriate.

***Conserving and enhancing the Borough's landscape character, open space, biological and geological diversity, heritage and cultural facilities.***

Agree entirely but to truly realise this vision we would need to develop policies which restrict garden infilling.

***Making provision for a full range of social, leisure and community facilities.***

It is important to appreciate that our market towns need such facilities as well as Hemel Hempstead if our communities are to flourish. We should not encourage nor expect everyone to depend on those in Hemel Hempstead

**Question 2**

Yes, but we doubt that the planned level of housing growth is sustainable in the absence of supporting infrastructure.

We would wish to retain the current mix of housing in Berkhamsted which includes one third detached properties if we are to maintain the character of the town.

We are concerned about the number of trees lost in the pursuit of more development and would welcome a tree planting and retention policy.

We do not believe that further erosion of garden space is sustainable given the limited open space in Berkhamsted.

**Question 3**

Yes. Local policies and SPG's need to be strengthened if we are to preserve the size and character areas of our market town.

There is a need to control the pace of windfall development and decide where it should and should not occur.

There is a requirement for development management policies linked to the SPG's to guide garden infilling

**Question 4**

Yes. We should also have restrictive policies on infilling in Berkhamsted to encompass both the conservation and peripheral areas.

**Question 5**

Yes, subject to the recommended density levels and the adequacy of infrastructure.

**Question 6**

Yes

**Question 7**

Additional items to consider are: maintaining and expanding trees and forestation and minimising hard surfacing.

**Question 8**

Yes, however, much of this is impossible to implement in Berkhamsted given the topography of the Town. This should place severe restrictions on development in the peripheral areas and this should be reflected in the Local Policies.

It is difficult to have cycle lanes in Berkhamsted given the nature of our roads— we would not wish to encourage cycling along the canal. More emphasis needs to be placed on the pedestrian especially in the town centre. Speed limits should be severely curtailed, in urban and suburban areas. Hertfordshire Highways should be encouraged to share the vision.

**Question 9**

Yes. Windfall accounts for 16% of the housing programme. This needs to be carefully monitored and strong local policies are required to prevent its negative effects, for example, on the environmental ambitions contained in the emerging core strategy.

**Question 10**

We agree that new pitches, like affordable housing, should be linked to substantial new development. However, if Gypsy and Traveller sites are incorporated into new housing developments access to the sites will need to be carefully arranged. Sites should not be allowed in the AONB.

**Question 11**

Yes. The relocation of the main hospital facility to Watford illustrates some of the contradictions arising from the aim of encouraging walking and cycling when you do not have community and leisure facilities available locally.

**Question 12**

Yes. We need to encourage independent retailers in Berkhamsted and provide for incubation units to encourage small businesses to grow.

**Question 13**

Yes

**Question 14**

The problem in Berkhamsted is that all the shops are in the town centre whereas much of the housing is on the outskirts of the Town – e.g. Chiltern Park. Retail needs to be more evenly distributed to stop the traffic and parking gridlock.

**Question 15**

There is a dearth of accommodation for tourists and many of the sites mentioned are only accessible by car. Not everyone walks or cycles and to expect them to is wishful thinking. See also Spatial Strategy for the Countryside. The canal in Berkhamsted should be carefully preserved as it can form the basis of sustainable tourism in the region.

**Question 16**

Yes. Particularly welcome is the emphasis given to biodiversity and the protection of biodiversity networks in urban areas. Many of these networks/corridors run through gardens, which emphasises the need to give the latter more adequate protection against garden infilling. Please spell out the protection measures and raise the importance of biodiversity in planning decisions.

27<sup>th</sup> August 2009



## **Response to Questions in the EMERGING CORE STRATEGY: PART 2 BERKHAMSTED**

Answers to each specific question in the questionnaire are as follows:

### **Question 1**

The broad thrust of the Vision is agreed but there is no reference to the need for an adequate infrastructure to support new housing. The level of new housing itself will be a critical factor in determining whether this vision can be achieved. We would like to delete the reference to Fair Trade and Transition Towns which we do not consider to be planning issues. We would like to see houses for families – the word “housing” is too vague and needs clearer definition.

### **Question 2.**

As additional key issues the following should be added: infrastructure, in particular, traffic congestion and the pollution it causes, loss of gardens together with the effect that will have on amenity space and ecological corridors, maintaining and respecting the area SPGs, maintaining the character of an historic market town, loss of farmland, and loss of Green Belt. More emphasis should be placed on the needs of cyclists and pedestrians.

### **Question 3**

We do not support this level of growth. The assumptions underlying the growth figure of 1200 are critical as to whether we need to release Green Belt land at all and whether we need to increase the density of housing on the Durrants Lane site. We note that despite considerable background research into land available for housing and the identified sites within the town the figure for the actual level of growth specified is arrived at by a rather broad brush piece of guesswork that is not supported by any material evidence. In particular, in para 3.4 it is stated that the detailed assessment of the sites available for strategic housing provision has been tested against a range of assumptions for growth between 750 (to maintain the existing population) and 1500 (natural change) until 2031. In the following paragraph (3.5) it is stated that the preferred level of growth to plan for is 1200 dwellings by 2031. The precise choice of this figure is important in terms of the implications

that it has for the amount of Green Belt to be released in the plan yet no supporting evidence for it is provided at all. From the paper *Population: Background Note for the Core Strategy*, dated April 2009, we have the following figures for the market towns in the borough:

	Tring	Kings Langley	Bovingdon	Berkhamsted
Zero net migration, CLG household size projection (2006)	4880	1698	1667	7846
Zero net migration, CLG household size projection (2031)	5819	2025	1988	9355
Change 2006-2031	938	327	321	1509
Maintain population, CLG household size projection (2006)	4800	1671	1640	7717
Maintain population, CLG household size projection (2031)	5265	1841	1799	8464
Change 2006-2031	465	170	159	747

In the text of the Emerging Core Strategy the following set of justifications are provided for the assumed growth figures, 2006-2031, for each market town:

Tring; In para 3.4 , page 150, is stated “Our view is that a minimum of 465 dwellings would maintain the current level of population and a maximum of 939 dwellings would be sufficient to accommodate natural growth (2006-2031).” In para 3.6, it is stated the figure of 460 dwellings should be used (310 in urban areas and 150 in Green Belt releases), which corresponds to the growth level consistent with “**maintain population, CLG household size**”, in the above table.

Kings Langley: In para 3.8, page 120, it is stated that “We suggest that the Dacorum part of Kings Langley should accommodate modest levels of new housing of around 150 new dwellings over the period 2006 to 2031.” This figure corresponds again to “**maintain population, CLG household size**”, in the above table.

Bovingdon: In para 3.7 (page 67) it is stated that “We suggest Bovingdon should accommodate modest levels of new housing of around 150 dwellings in the village over the period 2006 to 2031.” Again this corresponds to “**maintain population, CLG household size**”, in the above table.

In the case of Berkhamsted, also a market town, however, a different approach is taken. Para 3.5 (page 47) states: “We believe that we should plan for an intermediate level of growth (1200) dwellings.” This corresponds to a figure rather more than the average of the two extreme growth assumptions listed in the table above. The reason why a rather different and significantly higher figure of growth is assumed for Berkhamsted in comparison with the other market towns in the Borough is not a consequence of the Regional Spatial Strategy which requires only that strategic growth in the Borough should be concentrated on Hemel Hempstead. The justification for limiting growth in the other market towns to a greater extent than in Berkhamsted seems to be related to infrastructure constraints. These also operate in Berkhamsted, except in the case of the provision of school places. All the other market towns have limited capacity to expand the schools whereas Berkhamsted has the space. However, as has been pointed out, Berkhamsted has other and very severe infrastructure deficits, in the form of on-street parking, road congestion, sewage capacity etc. Its valley location also poses recognised constraints.

The assumptions for Berkhamsted in the Emerging Core Strategy are not well founded and if the character of the town is to be preserved, should be more consistent with other market towns across the borough and should be set at 750 i.e “**maintain population, CLG household size**”, in the above table.

This would have significant implications for the need to provide dwellings in the town and for the need for Green Belt releases. We have tabulated the following information from the *Strategic Housing Land Availability Assessment* paper:

#### **Housing Commitments Berkhamsted /Northchurch Large Sites with Planning Permission**

	<b>No</b>	<b>Cum</b>
Hospice of St Francis	11	
110 High Street	12	
Stag Lane	150	
1 Park View	5	
12 Torrington Road	11	
Tunnel Fields	16	

Chilterns – Stoney Close 12

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**Total 217 217**

**Small sites 4 or less with planning**

45

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**Conversions with planning**

14

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**Legal Agreements**

George and Dragon 4

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**Total 63 280**

**Large Sites (5 or more)**

New Lodge 54

Chapel Street 7

St Katherine's Way 6

Rose Cottage 24

H/S Water Lane 49

Manor Street 20

Clarence Road 16

Stag Lane 27

Park Street 8

High Street	20
Alma Road	8
Durrants Lane	240

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**479**

**759**

In the Emerging Core Strategy a total provision of 1088 dwellings is identified, which consists of this figure of 759 (rounded down because of uncertainty to 736), plus 204 as the estimate for windfall, plus 148 dwelling units already completed. This is already significantly higher than the requirement of 750 dwellings. The figure of 750 dwellings should be taken as the growth assumption. Thereby no Green Belt releases would be needed in the town and the provision of housing at Durrants Lane could be limited to the 100 dwellings currently identified in the Local Plan. In the longer term it would also give some headroom to restrict the amount of windfall which we suspect will be in gardens.

**Question 4.**

Yes.

**Question 5.**

In answer to Q.3 we have given reasons why we believe that the requirement for Green Belt releases at the level indicated is unnecessarily high and there are equally valid, if not more valid, reasons to consider a lower figure. We have suggested 750 as the growth figure which would not require any Green Belt releases. Nevertheless, with the caveat that we do not believe that any of these sites are necessary given the level of growth that needs to be planned for, we make the following observations on each site in turn:

(a) Option 1 is not acceptable for green field development for the following reasons:

- this site is close to the Chilterns AONB and the landscape impact would be unacceptable,
- we doubt that this site could accommodate 50 dwellings
- pedestrian and vehicular access to the town centre is inadequate.

(b) Option 2 is not supported for green field development for the following reasons:

- This piece of land is high above neighbouring properties and would have a disproportionate landscape effect,
- The tree line adjacent to Hill Top Road would be adversely affected,
- Access from either Hill Top Road or Chesham Road would be problematic.
- Again we doubt that as many as 50 dwellings could be accommodated.

- This is an area of open space within the town boundary and should be preserved as such, possibly by some of the land designated as Public Open Land.

(c) Option 3 is not supported. It is on the periphery of the town and would set a precedent for infilling up to the A41. The road junction where Shootersway meets Kings Road is inadequate.

(d) Option 4 is not supported. It is on the periphery of the town and would set a precedent for infilling up to the A41. It is close to AONB and there would be detrimental landscape effects. The proposed density would contradict the key principles established in the Urban Design Assessment for peripheral areas in Berkhamsted. There is already a problem with water pressure and sewage capacity for housing along Shootersway and Coppins Close. Development here would lead to a permanent loss of farmland, detrimentally affecting the rural environment when food prices are expected to substantially increase in the long term.

**Question 6.**

Yes, but there is a need to clarify densities. It is important that new development does not prejudice the environmental strategy. The current application of the SPG in the character areas is gradually leading to an erosion of the character of the suburban areas of the town. We welcome the emphasis on biodiversity. As indicated in the answer to Q.5 we believe that there is a possibility of providing Open Land at Ashlyns.

**Question 7.**

We do not accept that there is a need to be “more flexible” in the approach to school sites in the Green Belt.

**Question 8.**

We agree that the Northbridge Road/Billet Lane area should be protected as employment land. We believe that there may be potential to provide housing on the site of the Post Office /BT building in the High Street.

**Question 9.**

(a) and (b) Yes, but limited to the proposed 10 dwellings forming part of the refurbishment of the existing buildings. (c) No.

**Question 10.**

No. Berkhamsted Town Council wishes to maintain its policy of opposing the construction of the Link Road as it will lead to excessive, heavy traffic passing through the suburban areas in the vicinity of Bridgewater Road

**Question 11.**

Yes

**Question 12.**

The Spatial Strategy appears to be inconsistent with the vision for the town. A key principle of the urban design is that peripheral zones should have detached housing on large plots at very low density as set out in Table 1 of the Spatial Strategy for Berkhamsted. The suggestion by the developers of a high density development on the Durrants Lane/Egerton Rothesay School site is in contradiction to this core strategy. A high density development on this site, in particular, would require the use of flatted development which would severely exacerbate the landscape impact as seen from across the Bulbourne valley.

There is a need to clarify definitions of LOW/VERY LOW etc. densities and the relation to the SPG. The urban design checklist based on PPS3 appears to be allowing infill at "Low" densities in areas that are currently "Very Low". In development in or near to areas specified as "Very Low" very low densities should be required. These need to be given more precise targets in SPG related to characters areas.

We believe that to minimise the impact on Green Belt release the estimated windfall figure should be as high as can be justified by evidence, subject to the formulation and application of policies to limit garden infilling as suggested above.

We support a 2<sup>nd</sup> tier on the station car park, provided this can be done in a sensitive way that minimises disruption to adjacent residents in Bridgewater road.

Encourage more cycle and pedestrian routes, particularly to and within new developments.

We wish to emphasise that the infrastructure (roads, parking, sewers, water supply, etc.) is inadequate already - it is quite inadequate to cope with any further housing. No further housing should be permitted until this deficit has been rectified. This is particularly the case for housing on the edge of the town for which there is unlikely to be any public transport available to carry people to the central town facilities.

We challenge the infill/garden grabbing assumptions behind the windfall figures – and whether they are consistent with the SPGs.

Protect ecological corridors.

The Town Council is having to respond to a substantial increase in demand for allotment land. An area should be set aside in the plan to accommodate this use.

27<sup>th</sup> August 2009