

Berkhamsted Residents' Action Group

**Statements
to the
Independent Examination
into
Dacorum Borough Council
Core Strategy**

18 September 2012

Issue 11: Berkhamsted

Berkhamsted is a compact, valley market town with considerable character and history. It has evolved from Roman times at a steady pace. At the heart of the town is a mixed economy of commerce, retail and leisure with national and independent traders and occupiers.

Light industrial employment remains but in recent years industry at Coopers and at Stag Lane has closed and the resulting brownfield sites redeveloped as residential property. Attempts to draw retail away from the town centre have been resisted.

There has been a decline in employment space – between 2001 and 2012, 24,000 sq. m. of A2 and B2 space has been converted to residential use. The growth in population to some 18,000 has been carefully managed but has also placed a considerable strain on the town's infrastructure.

The CS promotes further growth and we consider the proposed increase of 1180 new homes to be above what is required for natural growth. Any further development must be carefully managed over time and restricted to small scale opportunities.

Incursions into the Green Belt must be strongly resisted. Greater numbers of new homes will have a considerable adverse impact on the town's character and environment. Therefore, while we would limit growth to a lower number (as discussed in Issue 6) and would exclude Hanbury's (LA4) from the projected numbers, we support Dacorum's careful and responsible approach to the growth of the town and their analysis of possible housing sites which have been discounted.

All reasonable sites have been assessed and, as discussed within Issue 2, DBC's selection process is more transparent and robust than some devised by land owners promoting their land for development.

In November 2011 Savills on behalf of GUI submitted an assessment of "alternative Green Belt sites in Berkhamsted". This was further to their assessment of Green Belt sites across Dacorum in 2010.

Savills have used an assessment methodology and scoring criteria (which is presumed to be of their own devising) based upon PPS3 (Housing) and PPG 2. They have therefore used criteria for assessing development potential and deliverability and meeting sustainability targets to assess Green Belt. The NPPF reinforces the importance of protecting existing Green Belt which cannot be defined as development land.

Savills state that sites scoring 21-28 on their assessment method represent the most sustainable sites against PPS3 criteria in terms of availability, sustainability and achievability. Sites scoring 14-20 have less sustainable credentials. Savills score the GUI land at 21, which ranks seventh in their list of similar potential sites in the Borough.

Given the breadth of factors used in the methodology there will inevitably be an element of subjectivity in assessment of different sites but one factor does stand out in that Savills classify their client's Green Belt land as "Quasi Brownfield Green Belt" and not "Edge of Settlement Green Belt".

"Quasi" means "as if it were" or "seemingly". "Brownfield" is land previously built on (PDL).

Thus Savills are of the view that the GUI land is not Green Belt nor is it productive agricultural land which has never been built on. If they had scored the land as it is rather than as they would like it to be their method would put the land in 14-20 category with "less sustainable credentials".

Further examination of Savill's assessment throws up a number of other interesting variations. Berkhamsted is a compact town and certain assessment criteria should produce similar scores, eg for "Existing Transport and Utilities Infrastructure".

The seven Berkhamsted sites reviewed in 2010 as measured by Savills' guidelines are virtually the same in this respect and a variance of 2.2 to 2.8 is not justified. The average score of 2.6 would be more appropriate.

Similarly "Access to Local Employment, Services and Facilities" is the same for all sites rather than a variance of 2.63 to 3.5. The average is 3.

Other criteria will produce a range of assessment scores as they are site specific. For example "Environmental and Heritage Constraints". The range for the seven Berkhamsted sites is 2.4 to 3, with the GUI site at 2.9. Five of the sites are in a corridor close to the A41 running in an east to north west direction. Several are stated to have wildlife constraints with the potential presence of protected species.

Despite the presence of a wildlife site within its boundaries there is apparently no such challenge on the GUI land and such that there maybe can be "managed". Overall it is not clear why the GUI land should be scored higher than the land at Egerton Rothsay (SS1) at 2.68 and a score of 2.7 is more appropriate.

It is worth noting that under this "Environmental, etc..." criteria there is no reference to the impact on the environment of the by products of development such as traffic generation. Savills restrict their assessments to the impact existing road and rail infrastructure may have on new development.

All new development will generate incremental traffic movements but the scale and concentration of the GUI development they are promoting will have a greater adverse impact on existing infrastructure, air quality and traffic movement. If this factor was scored the GUI site would compare very unfavourably with the other sites being promoted for development.

"Potential Contribution to Infrastructure Investment". Given the scale of the GUI proposals a high score can be expected. However it is pointed out elsewhere (GUI Planning Document

s2.11) that any promised improvement to bus services is subject to a viability test and the proposed 'village centre' or 'local hub' is unsustainable as discussed earlier (Issue 2 and Appendix 2).

The proposed east-west link between Chesham Road and Swing Gate Lane could improve connectivity but is largely a requirement of the development itself and it is worth remembering that the northern section of Chesham Road is one-way southbound. No real infrastructure improvement to Swing Gate Lane is proposed despite the heavy increase in vehicle movement.

So despite a very significant uplift in land values resulting from residential use the level of infrastructure investment looks slim and potential not realised should mean a score on this criteria of no more than the average for the Berkhamsted sites which is 2.43.

"Land Ownership/Availability". With the exception of the Little Kingshill site all Berkhamsted sites are being actively promoted for development by their owners although some may lack the resources of GUI. Otherwise it is not clear why a range of scores 2.83 to 3.83, is given for this criteria. Land at Egerton Rothsay (SS1), which is not Green Belt and is supported by DBC, is scored at 3.17. It is no less certain than the GUI proposal and this therefore seems an appropriate score for that land as well.

Adjusting the criteria scores as outlined above puts the GUI land on 19. This ranks it at 20 out of the 38 sites in Dacorum assessed by Savills. There are more sustainable sites in Berkhamsted as well as in the Borough.

SS1 is not Green Belt but it is at the outer limit of the scale of any single development site that the town could contemplate, and the proposed housing density is not in keeping with the surrounding area. It will however contribute to sustainability in reducing pressure on other less appropriate sites in the town.

However, BRAG does maintain that the true local housing need for Berkhamsted is considerably lower than DBC have set and the lower figures suggested in Issue 6 will allow SS1 to be developed at a density more in keeping with the surrounding area.

BRAG does not believe the consequences of development on local infrastructure have been satisfactorily addressed and our views on this topic are explored in part under Issue 3. Pressure on highways, congestion and insufficient central parking are challenges already present.

The proposed change from a three tier to a two tier education system should mean that existing under-used facilities will satisfy demand. Higher development numbers than planned will drive the need for more school space and a likely incursion into the Green Belt.

The current school provision is not adequate to cope with the number of school age children in Berkhamsted (and those even younger who will require places in the very near future). As a result a consultation is currently underway to decide how best to solve this. The decision will be made in the autumn and the outcome will be either to change the education

in the town from a three tier to two tier system or to build a new primary school at Bridgewater on the north side of the valley.

Local health services are sufficient. Where the CS fails is in providing the Borough and its towns with a proper NHS hospital facility. This may be outside this remit but it remains a major concern for residents.

The recommendation (subject to final objections) is to change to a two tier system. However Swing Gate School and Victoria School will only admit children aged 3 to 7. These children will all then progress to Thomas Coram School from age 7 to 11.

BRAG has been informed by Herts County Council that the present consultation by their Children's Services colleagues relates to the needs of the settlement, as existing, not taking into account child yield that might arise out of the development which is being promoted by GUI.

The starting point of HCC would be that if there was further significant development above that allowed for in the CS (such as that proposed by GUI) then it would be important that the development "swallowed its own smoke" in terms of providing an appropriate level of new education capacity to serve the needs of the development.

The loss of commercial floor space, the redevelopment of brownfield land, the proximity to London and good transport links are moving the town towards a residential commuter town. BRAG advocate that further loss of non-residential space should be resisted; that opportunities for retail/commercial development should be concentrated in the town centre, with imaginative schemes at the former post office and police station and at the Water Lane junction. Existing employment space should be protected but further incursions into the town's fringes resisted.

The soundness of the CS can be improved by the establishment of an overarching policy statement which addresses the stresses and demands placed on the character, quality of the environment and the infrastructure that have come with recent growth.

The town is a victim of its own success and any significant additional growth will breach any definition of sustainability. The policy should integrate the aspirations for improvements to the Bulborne and the quality of the pedestrian environment. Tourism should have greater recognition and the importance of Berkhamsted Castle and the need for public facilities recognised. It should also note that growth will come from local ingenuity in creating windfall sites for development.

Local allocation at Hanburys (LA4) has not been properly justified. Its inclusion the CS flies in the face of DBC's stated aims to protect the Green Belt around Berkhamsted and seems totally contrary to MC82 as discussed in Issue 2.

In Issue 6, BRAG shows that the growth numbers fall well below the level that would require LA4 to be used so there are clearly no exceptional circumstances that would justify the inclusion of Hanburys/Old Orchard as a Local Allocation. Indeed, it could be argued that its inclusion will set a precedent for further development between Shootersway and the A41.

Appendix 2

Letters regarding proposed village amenities
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Mr Antony Harbridge
Chairman
BRAG
20 Hall Park Gate
Berkhamsted HP4 2NJ

Pressmead
13 Hall Park Gate
Berkhamsted
HP4 2 NL
29 June 2012

Dear Sir,

GUI South Berkhamsted Concept

I write as a Chartered Surveyor with over 40 years experience of commercial, retail and leisure property. This particular submission to the Public Examination into the Dacorum Core Strategy, relates to the intention by GUI to establish a “village centre” as part of their South Berkhamsted development proposals.

The centre, adjacent to Swing Gate Lane, would provide a convenience store, café, public house, medical centre and offices. It is presented as part of a package of ‘community benefits’, with the stated intention that ultimately the centre would pass into public ownership. This latter aspect makes it particularly important that the viability of these proposals is understood.

In forming an opinion of their suitability and viability I have discussed the proposed uses informally with two local commercial property advisers, namely Freeth Melhuish and Aitchison Rafferty, as well as drawing on my own experience.

The majority of commercial, retail and leisure property is located in Berkhamsted’s town centre. Exceptions include offices at Ashlyns Hall and convenience stores at Northchurch, Charles Street and Westfield Road. In recent years similar stores in the High Street, Woodlands Avenue and Gravel Path have closed as have pubs at Northchurch, Gossoms End and Berkhamsted High Street. There has been growth in restaurants and coffee shops, all of which are centrally located and demonstrate the increasing dominance of national chains.

Owners and operators of the proposed retail and leisure properties assess visibility, accessibility, parking, footfall and catchment size and characteristics. Prominence and high visibility are essential and this location fails on that assessment alone. There is growth in the restaurant/café/coffee shop sector but Berkhamsted centre provides 9 cafes or coffee shops and 10 public houses.

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My professional experience includes assessing site viability for pubs and pub restaurants and Costa style coffee shops. This location lacks visibility to passing vehicular and foot traffic, and therefore despite the proposed increase in population in the immediate vicinity there is insufficient demand to sustain these uses.

The property advisers I have spoken to have not studied the development proposals in any detail, but confirmed that these uses require central locations with good visibility for potential customers, and concluded that they are probably included as a requirement of the local planning authority, rather than as a viable development proposition.

It is my opinion that this aspect of GUI's plans for the area are not viable or sustainable and furthermore if built and subsequently transferred to local community ownership (GUI's stated intention), far from being a benefit, will become a burden on the community. As GUI do not see this as a long term property investment opportunity, they will be well aware of this; nevertheless they include them as part of a package of 'community benefits' in support of their attempt to secure a residential consent on the balance of their landholdings.

Savills, on behalf of GUI maintain that the critical mass of their client's proposals will enable investment into improved and new social and transport infrastructure. It is understood that their proposed new medical centre is not required. This would leave the proposed office content of the centre to stand alone. I have not considered the viability of stand alone offices, but this does seem to be an unusual location and unlikely.

Overall there must be considerable doubt as to whether any of the promised improved or new social infrastructure will be provided.

Yours Faithfully,



H R Siegle FRICS

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Peter J. Brown FRICS
Chartered Surveyor

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Greenwood
Gravel Path
Berkhamsted
Herts
HP4 2PQ

Mr. Antony Harbridge
Chairman
Berkhamsted Residents Action Group
20 Hall Park Gate
Berkhamsted
Herts.

6 March 2012

Dear Mr Harbridge,

Proposed development at South Berkhamsted

I refer to the proposal by GUI for large scale predominantly residential development of the area between Upper Hall Park and the Berkhamsted by-pass. I understand that this is to be examined at the inquiry to be held later this year into the proposed Core Strategy, produced by Dacorum Borough Council.

I write to offer my views as a detached observer of large scale planning proposals in the town, rather than as a local resident likely to be directly affected by the proposal, as I live on the other side of the valley some distance away.

My interest in such schemes springs from my career as a Chartered Surveyor over many years, principally engaged in the commercial and leisure sector of the property industry, which informs my views on proposals of this nature, and this coupled with having been a resident of the town for a long period has attracted my attention to this application.

I believe that there is a substantial body of opinion against the proposal, but my interest is drawn in particular to the proposal to incorporate a local neighbourhood centre within the scheme, and my comments are mainly confined to this. However I do have a reservation about the size of the scheme, in that some 800 dwellings, which must increase the population of the town by at least 2000 inhabitants, must surely have an adverse impact on the town's infrastructure, which is recognised as being already inadequate for the current population size.

From my impartial viewpoint, there do appear to be some serious flaws in the thinking behind the neighbourhood centre element of the scheme.

I question the developer's assertion that the neighbourhood centre 'presents the opportunity to extend and enhance the existing High Street retail facilities.....'
It is a fact that there are empty shops in the High Street at present, and most property experts expect a contraction of retail businesses due to changed shopping patterns brought about by economic and other factors, such as an increasing trend towards internet shopping. While the nature of a convenience store is just that, and unlikely to

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be affected as much as many types of retailers by internet shopping, it is the case that a convenience store in the High Street closed a while ago.

I would question whether there is a sustainable demand for a convenience store in this location.

I also note the proposal to include a public house in the 'neighbourhood centre' area. My experience of 'estate' or what are otherwise known as 'community' pubs is that they invariably prove to be unsustainable in the medium term, and I have witnessed many that have closed in these sorts of locations, and become a boarded up eyesore, bringing an air of deprivation to their surroundings.

Many more pubs are closing than are being opened, and the new ones are in prominent locations, and usually of substantial size, enabling them to serve meals as well as drinks. Community pubs, which are heavily dependant on drinks trade, are somewhat outdated, and few pub operators will wish to invest in one.

I make these comments from the perspective of having been involved over many years at a senior level in the property department of a large leisure operator with a very substantial public house portfolio, so my views are made with considerable in depth knowledge of the viability of public houses.

I further notice that it is proposed to include some 1200 sq. metres of offices – again, I really question the viability of this, given the amount of office space available in the town. This amount of office space, if tenants were found, would inevitably result in an increase in car borne traffic to an area where the existing and proposed highway provision will result in some local feeder roads becoming extremely busy.

Overall, it seems to me to be ill considered to propose a neighbourhood centre which contains a convenience store, a café and a public house. If any one of these were to fail, it would inevitably have a knock on detrimental effect on the viability of the others, and one could imagine that the centre might easily become a somewhat neglected and sterile eyesore in the not too distant future.

I am not sure that the developer is wholeheartedly convinced of the viability of the 'neighbourhood centre', and there are indeed references in the 'small print' to suggest that some at least of the elements may not be necessary. If I were cynical, I might think that this idea has been included in order to make the scheme seem more attractive. In reality, for the reasons outlined, I think it is likely to be unsustainable from the outset, and a promised 'benefit' which the developer may well wish to unburden itself from at an early stage.

I offer these views for your consideration, and I do hope that the whole ethos of the neighbourhood centre here is subject to rigorous challenge at a public enquiry.

Yours sincerely,



Peter Brown FRICS

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Mr Antony Harbridge
Chairman
BRAG
20 Hall Park Gate
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Pressmead
13 Hall Park Gate
Berkhamsted
HP4 2 NL
14 September 2012

Dear Mr Harbridge,
GUI South Berkhamsted Concept

I refer to my letter of 29 June 2012 and our subsequent conversation in which you asked me if I had any market evidence to back up the professional opinions you have received on the viability of the proposed 'village centre'; part of the development proposals for the land at South Berkhamsted.

All operators of coffee bars, new pubs and convenience stores will make a market assessment of a site which will include an examination of the catchment area, its size and socio-economic profile; competition and location factors, including access, prominence and visibility, existing and potential footfall and the opportunity for passing trade. The major players have location planning teams that assess each site using financial business models to indicate levels of profitability.

In respect of convenience stores I understand Tesco and Sainsbury have weekly sales targets of £40-50,000 for new stores in London and the South East. Waitrose are also active in this market and I have discussed this specific location with one of their acquisition managers.

His conclusion was that the site is not nearly strong enough to support the level of turnover required and pointed out that the catchment area is at the most half of what would normally be expected, as the land to the east and south is open countryside. The additional residents resulting from the proposed residential development would not have a significant impact on this analysis.

You also asked me to comment further on the proposed stand-alone offices in the 'village centre' given that the nearby Listed Ashlyns Hall is also in this use and at a location remote from the town centre. I suggest there is a vast difference between a careful adaptation of a complex of historic buildings in a parkland/garden setting, for offices and other business uses, which are sustaining the buildings through economic use,

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and developing a new office building in the middle of a new residential estate. The latter would be a clear breach of Green Belt policy and I cannot see how it would be acceptable in planning terms even if it were a viable proposition.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'H R Siegle', with a long, sweeping flourish extending to the right.

H R Siegle FRICS