

Dacorum Borough Council Core Strategy Examination: October 2012

Statement from CPRE Hertfordshire (Representor Id: 498429)

Issue 11: Berkhamsted, Question 11.6

1. I, Eliza Hermann, represent CPRE Hertfordshire.
2. This statement complements our original representations on the Core Strategy Pre-Submission, which are still relevant except where updated by this statement, and seeks to address the Inspector's relevant questions as set out in his guidance note. In this instance, the relevant question 11.6 was agreed in email correspondence with the Programme Officer Ian Kemp during the week of 6-10 September 2012.

Question 11.6 "Is local allocation LA4 (Shootersway, Berkhamsted) properly justified?"

3. The Local Allocation LA4 contravenes national policy. The site is in the Green Belt, and development in the Green Belt is inconsistent with national policy. Specifically the intent of national policy is for Green Belt land to be protected for the long-term and kept permanently open, and to safeguard the countryside from encroachment of built up areas (paragraphs 79 and 80 National Planning Policy Framework(NPPF)). Further, it is national policy that Green Belt boundaries should only be altered in exceptional circumstances (paragraphs 83 of NPPF). Dacorum Borough Council has not presented any evidence of exceptional circumstances which justify extending the current Berkhamsted settlement boundaries and including LA4 in the Core Strategy.
4. Option 1 in the Draft Core Strategy proposed a lower figure of 9,835 dwellings throughout Dacorum over the 25 year plan period. The corresponding figure for Berkhamsted under Option 1, in the range of 750 dwellings, would not require LA4 to be removed from the Green Belt. Instead, the proposal for 1,180 new homes in Berkhamsted is too high: it is a higher rate of growth, proportionally, than that specified for the other Market Towns and Large Villages; it is inconsistent with the Borough Vision for Hemel Hempstead as the location in which to concentrate development; and it is inconsistent with the stated objective of supporting development that enables the town's population to remain stable unless a small amount of growth is required to support local community needs.

5. We do not believe the Council has presented evidence to justify why this higher rate of growth is needed. In addition, Berkhamsted cannot support this high of a growth rate without compromising the natural character of the town.
6. The LA4 site is in a sensitive ridge-top location with abundant wildlife, up a long hill and approximately 2 kilometres from the town centre, with poor public transport links and accessibility. Development of this site would adversely impact on views across the valleys to both north and south, and would not conserve or enhance the landscape; visual amenity or biodiversity of the site (paragraph 81 NPPF) but rather it would destroy it.
7. Development at LA4 is also unsustainable because it would also result in increased private car use, with consequent increased traffic congestion and car parking, and thus increased greenhouse gas emissions and pollution. We consider that these impacts are contrary to the stated intentions in the proposed Core Strategy.
8. CPRE believes there are several small and mid sized brownfield sites available for re-development within the existing Berkhamsted settlement boundary, that form reasonable alternatives to LA4 should the proposed level of housing is necessary. As far as we are aware these are not included within Dacorum's land availability assessment.
9. All of these sites are more centrally located than LA4 and all are situated along the valley rather than sited on the ridge top. Consistent with national policy these brownfield sites should be re-developed first (paragraphs 17 and 111 NPPF). The sites of which CPRE is aware include:
 - The vacant land at the southeast corner of the High Street and Durrants Lane, where housing previously existed;
 - The former NHS facility at Victory Road in Gossoms End just off the High Street, which the NHS mothballed several years ago and is vacant;
 - The former Royal Mail sorting office on the High Street near the town centre, which has been vacant since last year;
 - The former Police Station on the High Street in the town centre, which has been vacant since last year;
 - The site of the former Birtchnell's building on the High Street in the town centre, which is currently empty.

Summary

10. The Local Allocation LA4 is unsound because it is:

- Not justified – inclusion of LA4 is not the most appropriate strategy when considered against the reasonable alternatives of a lower housing target and/or the development of brownfield sites.
- Not consistent with national policy – inclusion of LA4 does not enable the delivery of sustainable development in accordance with the policies in the Framework. LA4 contravenes Green Belt policies, and brownfield first policies.
- Local Allocation 4 should be deleted.