



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Issue11: Berkhamsted

September 2012

Purpose of this statement

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

Matters raised by Inspector

- 11.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Have all reasonable alternative sites been assessed?
- 11.2 Is proposal SS1 properly justified in terms of sustainability? Is there an issue of flood risk to be addressed? What is the timetable for the submission of a planning application?
- 11.3 Have the consequences of development of local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?
- 11.4 Is there a need for additional retail and/or employment floorspace to be allocated in the town?
- 11.5 Should there be a specific policy for the town as a whole in order to ensure that the Council's vision will be delivered?
- 11.6 Is local allocation LA4 (Shootersway, Berkhamsted) properly justified?

Dacorum Borough Council's Response

11.1 Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact? Have all reasonable alternative sites been assessed?

11.1.1 In order to ensure preparation of a distinctive planning framework that reflects the needs and priorities of different communities, the Council has prepared an overarching Core Strategy with spatially distinctive strategies for each place within the district. This includes Berkhamsted.

National guidance

11.1.2 Achieving sustainable development is the Government's stated purpose for the planning system (paragraph 6 NPPF (Examination Document REG15): it is elaborated in sections 1-13 of NPPF.

11.1.3 There are 3 aspects to sustainable development – i.e. an economic role, a social role and an environmental role. These roles are interlinked and should not be taken in isolation (ref. paragraphs. 7 and 8, NPPF). Economic, social and environmental gains should be sought jointly (also ref. paragraph 8, NPPF).

11.1.4 Paragraph 9 (NPPF) summarises what pursuing sustainable development involves: i.e.

“...seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- *making it easier for jobs to be created in cities, towns and villages;*
- *moving from a net loss of bio-diversity to achieving net gains for nature;*
- *replacing poor design with better design;*
- *improving the conditions in which people live, work, travel and take leisure;*
and
- *widening the choice of high quality homes.*

Plans (and decisions) need to:

“... take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas.” (Para. 10 NPPF). Furthermore, “Local plans are the key to delivering sustainable development that reflects the visions and aspirations of local communities.” (para. 150 NPPF)

11.1.5 The Council concludes that:

- a) the purpose of the Core Strategy and place strategies is to ensure that new development is sustainable;
- b) the Core Strategy should guide development to sustainable locations;
- c) development should support the achievement of the objectives and factors listed above;
- d) the appropriate balance between these factors may vary from place to place, due to their particular characteristics and their current and intended role within the Borough; and
- e) due consideration should be given to local community aspirations.

11.1.6 These principles underpin and are articulated in the Pre-Submission Core Strategy (Examination Document SUB1). The Council has looked at the role of each place within this context and outlined what it considers to be the most appropriate strategy.

11.1.7 The settlement hierarchy for the borough and descriptions in Table 1 is based on the function and character of each place, and potential scale of change which each settlement (and the countryside) can reasonably absorb without undue detriment (see 2.1 in Issue Paper 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt).

11.1.8 Berkhamsted is defined as a market town which has limited opportunity for new development. Nevertheless it has an important role in meeting local housing needs, jobs and services. The broad approach to development set out within the Dacorum Borough Local Plan 1991-2011 (Examination Document OT1) remains appropriate.

Local Considerations

11.1.9 The Borough's needs and those of places within it have been considered through the creation of a substantial evidence base. This comprises technical studies, the results of public consultation and testing through the sustainability appraisal process: among other things they address the matters listed in paragraph 9 of the NPPF (see above).

Technical studies

11.1.10 Technical studies form an important part of the Council's evidence base. They look at the Borough both as a whole, and specific places within it. For all technical work carried out until July 2009 (Guide to the Evidence Base: Examination Document OT4) the conclusions were broken down into key place-based recommendations to assist the formulation of the individual Place Strategies.

11.1.11 The approach to homes and jobs within Berkhamsted has been informed by:

- Housing assessments (e.g. Examination Documents HG9, HG14 and HG16)
- Employment space studies (e.g. Examination Documents ED1, ED8 and ED12)
- Retail studies (e.g. Examination Documents ED2 and ED6).

11.1.12 For Berkhamsted, key recommendations are as follows:

Employment - Berkhamsted has considerably fewer workplaces than economically active residents, so there is a case on sustainability grounds for maintaining the current levels of employment in the town, through retention of existing capacity for B-class uses.

Retail – The latest retail assessment suggests that allowance should be made for a small element of growth i.e. 6,000 sqm (net) of comparison floorspace and 1,000 sqm (net) of convenience. This will result in relatively modest overall change over the plan period.

Housing – The starting point has been to retain the town's population at approximately its current base, and then considering what additional provision should be made. The Council has taken also into account Berkhamsted's role in the settlement hierarchy, future urban capacity, and the impact of development on its character, setting and infrastructure. Local objectives for housing have been set to reflect these conclusions, indicating an expected delivery of around 1,180 new homes between 2006 and 2031. The need for the outward expansion of the town has been considered and realistic options for this expansion weighed up through consultation on Site Allocations DPD (Examination Documents SA1 and SA5), and Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15) and through the Sustainability Appraisal work (Examination Document CS19) – see response to Issues 11.2 and 11.6 below).

Policy CS19: Affordable Housing sets a lower threshold for on-site delivery of affordable homes than Hemel Hempstead to reflect local conditions (see response to Issue 7: question 7.2).

Environmental – Key documents include the Urban Nature Conservation Study (Examination Document EN3), the Urban Design Assessment (incorporating updates) (Examination Document BP5), the Open Space Study (Examination Document EN6, and Green Space Strategy and Green Infrastructure work (resp. Examination Documents EN12 and EN10). Advice has also been received from experts, including English Heritage, the Council’s ecological adviser from the Hertfordshire Biological Records Centre and the County Archaeologist. This advice has helped identify the urban structure of the town articulated on the Berkhamsted Vision Diagram and reflected in the Place Strategy. This structure includes urban and strategic wildlife corridors, open land, green gateways and urban design zones. Of particular note are the role of the Grand Union Canal as a strategic wildlife corridor that runs through the centre of the town.

Infrastructure – Through technical work (especially the Infrastructure Delivery Plan and Update – Examination Documents ID3 and ID5) and consultation, relevant thresholds for new infrastructure and the capacity of existing infrastructure, including schools (especially primary schools), road network, leisure and community uses and utilities infrastructure have been considered. Consideration has also been given as to whether there should be any ‘jumps’ in thresholds e.g. what infrastructure is needed to accommodate different scales of development. In particular, primary school planning has been a useful check on the scale of new development. While primary schooling in the town is sensitive to growth the County Council is satisfied that they can accommodate this, especially with the identification of the two educational zones in the Place Strategy to meet the needs for future places. The level of development proposed for the town in the Core Strategy is accepted by the County Council in terms of service issues. See also response to Issue 8: question 8.2 for further information regarding education issues within the town.

11.1.13 The recommendations of all this technical work has been taken into account when developing the Berkhamsted Place Strategy – both in the formulation of the vision, the setting of local objectives and the approach to growth and change

Consultation

11.1.14 Consultation has been carried out with residents and stakeholders. A full summary of the consultation processes, the results received and how this consultation has resulted in changes to the Core Strategy (up to the stage of Pre-Submission) is set out in the Report of Consultation (Examination Document SUB6). Key elements have been:

(a) *Place Workshops* (see Volume 3 of Report of Consultation – refer to section 1 in Annex A).

11.1.15 This involved local councillors and representatives from a wide range of local businesses, residents and other organisations. A range of questions were asked in relation to crime and anti-social behaviour, leisure and recreation, transportation, the environment, housing, employment, population, development options and design/character of the town.

11.1.16 The top 5 priorities identified for the town were:

- Improve infrastructure before development.
- Design and develop with local distinctiveness.
- Provide facilities for youth and teenagers.
- Retain infrastructure and community feel.
- Slow down garden infill.

(b) *Emerging Core Strategy* (see Volume 4 of Report of Consultation).

11.1.17 The Emerging Core Strategy contained draft settlement strategies for each place, with background context covering siting and size, landscape and built character, key views, leisure, sports and community facilities, and local business. The evidence base was summarised and presented by place at this stage to inform the consultation.

11.1.18 The consultation asked for feedback on a level of growth of 1,200 new homes. This would require some Green Belt release. A number of sites were rejected (and reason given). Respondents were asked for feedback on the remaining options of:

- Land off New Road, Northchurch
- Land south of Hilltop Road.
- Land to at Hanburys, Shootersway
- Land adjacent to Blagberyy Gardens, Shootersway.

11.1.19 There was strong local opposition to the vision, suggested level of growth and town strategy. This included significant opposition to most of the greenfield housing sites put forward except for the Hilltop Road option. Local residents also objected to taking a more flexible approach to school land to accommodate future school places. Much of the negative views may have stemmed from concerns over the (then) level of development at Durrants Lane / Shootersway (i.e. Strategic Site SS1).

(c) *Consultation Draft* (see Volume 6 of the Report of Consultation)

11.1.20 In this version of the plan, feedback was sought on the proposed Berkhamsted Place Strategy including two housing options (set at 1,130 and 1,200 new homes). The housing options had been narrowed down to three sites: the strategic site at Durrants Lane / Shootersway and two local allocations at Hanburys and New Road, Northchurch.

11.1.21 In particular, the role of this consultation was to:

- test out different growth scenarios;
- test alternative locations for outward growth; and
- highlight any specific issues that had become apparent for that settlement and what alternative options were for tackling these issues.

11.1.22 Opposition to the Place Strategy was directly related to opposition to the local allocations and strategic site. Large numbers of residents (supported by a local opposition group) continued to object to Proposal SS1 in terms of its capacity, effects on the character of the area, transport implications and perceived lack of infrastructure to support the development. The housing proposal at Hanburys (Proposal LA4) and development at New Road (especially the associated link road proposal) were similarly opposed.

11.1.23 Whilst the Council recognises there are differences of opinion regarding the precise level of growth proposed for the town, the Council is in general agreement with local groups such as Berkhamsted Residents Action Group that the topography of the town and a range of infrastructure and locational constraints mean that the settlement's growth needs to be restricted. It is not suitable for the scale of development and change put forward at south Berkhamsted by Grand Union Investments.

(d) Citizen's Panel

11.1.24 Views from residents were separately sought through the Council's Citizens Panel. This helped to ensure that the views and aspirations of a representative range of people from all parts of the borough were considered.

11.1.25 This consultation highlighted a high level of support for the general approach to Berkhamsted, although the issue of outward growth was controversial in all locations.

Sustainability Appraisal

11.1.26 A Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) has considered the issue of the distribution of growth (see response to Issue 2) and also considered each individual place strategy against a series of sustainability criteria (which were agreed following consultation with key bodies). The full assessments are contained in Examination Documents SUB3 and SUB7. While the Sustainability Appraisal highlighted some negative effects of new housing on infrastructure, natural resources and the environment, it did forecast a number of positive impacts. Delivery of the spatial strategy was seen as making the town a more attractive place to live and work by maintaining employment opportunities, providing housing and protecting the key district shopping and service role of the town centre.

11.1.27 Where a developer / landowner (such as from Savills on behalf of GUI) has questioned the conclusions of the Council's independent SA consultants, the

Council has asked the consultants to re-consider their assessment and provide comments on the alternative assessment put forward (see Appendix 2 to the SA Addendum: Examination Document SUB7). The SA consultants have responded to criticisms from Savills who raised a number of concerns about the SA methodology and conclusions and questioned whether different development distributions had been properly assessed. The SA consultants concluded that SA process remained sound.

11.1.28 Account was also taken of the Habitat Regulations Assessment (HRA) (Examination Documents SUB4). The HRA pointed out that the removal in the Core Strategy of the consideration of major development sites in Berkhamsted (and the other towns) and the tunnel fields road link should reduce the risk of disturbance to the Chilterns Beechwood Special Area of Conservation (SAC). While suggested current development opportunities at Berkhamsted are not now seen as adversely affecting the SAC, the HRA did recommend a cautious approach to cumulative impacts and large scale greenfield development in terms of air pollution and recreation disturbance.

Conclusions

11.1.29 Berkhamsted is a small market town with some distinctive features which the Council intends to support – e.g. its valley town character, attractive historic core and Grand Union Canal. It is surrounded by farmland and attractive countryside, large parts of which are within the Chilterns AONB.

11.1.30 The town's historic character should be conserved, and where possible enhanced. There is a recognised shortage of open space (see Open Space Study, section 6.3, Examination Document EN6), with the consequent need to accommodate more playing fields and informal open space.

11.1.31 The town's urban structure, character and biodiversity are recognised in the Vision Diagram.

11.1.32 The scope for large-scale change within Berkhamsted is limited – the general trend is for small scale redevelopment and conversions to residential use. The town centre is relatively compact comprising chiefly of small shops, cafes and restaurants, and only a modest change in retail development is anticipated.

11.1.33 Existing employment provision should be protected, as replacement opportunities are constrained. Other employment opportunities ought to be fostered (e.g. in the town centre) and the unique role of the British Film Institute supported.

11.1.34 The key issue has been how far outwards the town should expand and how would this change the character of the settlement. Substantial levels of development can only be achieved by the release of Green Belt. The Council is reluctant to extend the town, but considers that population stability is unlikely to be maintained without it. Site SS1 should be supported as it represents a key

opportunity to delivery new homes, additional open space and other community benefits in the town in a non-Green Belt location (see response to question 11.2 below). A modest Green Belt site will provide other sources of local homes and 40% of the homes will be 'affordable'. It is considered on balance that LA4 offers the best solution (see response to question 11.6 below).

11.1.35 The Chilterns beechwoods provide part of the setting for the town. They are designated as a special area of conservation. A Habitats Regulations Assessment (HRA) would be required for large scale development, but this level of development is best avoided to prevent unnecessary damage to the Special Area of Conservation (SAC) through incremental development.

11.1.36 Seen within this context, it is considered that the approach set out within the Berkhamsted Place Strategy is both appropriate and justified.

11.2 Is proposal SS1 properly justified in terms of sustainability? Is there an issue of flood risk to be addressed? What is the timetable for the submission of a planning application?

11.2.1 While the Council would acknowledge that development of the site has raised concerns locally, it considers that Proposal SS1 is fully justified on sustainability grounds and is supported by technical and master planning work (Examination Documents SS1 and JS13 - 18).

11.2.2 The land was approved for inclusion within the Adopted Dacorum Borough Local Plan 1991-2011 (Examination Document OT1) for housing, social and community purposes and leisure, and has already been taken out of the Green Belt. The justification for the development remains unchanged.

11.2.3 There is continuing housing need and demand in Berkhamsted, and a significant shortage of open space in the town (see the Open Space Study: Examination Document EN6). The Framework Masterplan document also explains that site-specific circumstances have moved on since it was originally allocated (Examination Document SS1: see paragraphs. 2.11 – 2.17). Consequently, it is logical for the Council to fully explore and test the increased housing potential of the site, its deliverability, and whether the impact of the development, on balance, is acceptable.

11.2.4 The Dacorum Borough Local Plan Inquiry Inspector acknowledged in his report (paragraphs 4.19.9 - 4.19.12 of Examination Document OT9) that the scheme did not perform well against environmental criteria used at the time to assess potential sites. However, on balance, he did support its allocation recognising the potential package of benefits the development could bring, and this continues to be the case: there are no other identified large-scale housing sites in Berkhamsted that are already excluded from the Green Belt that can achieve these benefits.

11.2.6 The Sustainability Appraisal Addendum: Examination Document SUB7) has considered both the original and the amended proposal. The amended proposal

performs well against most of the sustainability criteria. The SA acknowledged some adverse environmental effects (as would be expected from any greenfield development) in terms of some loss of habitat, increased traffic and gas emissions etc. However, it also recognised the benefits of the allocation in relation to upgrading the school building, in meeting local housing needs, including affordable housing, and the positive effects on a number of economic objectives.

11.2.7 The Council recognises and accepts that the valley topography of the town does discourage walking and cycling. However, this is always going to be the case for this site (and any other greenfield development) positioned above the valley floor. This argument in isolation should not be used to stymie development opportunities. The proposal is reasonably well located in relation to local services and facilities, and measures to promote more sustainable travel are encouraged and can be delivered. The Council considers that the benefits of the site considerably outweigh any shortcomings.

11.2.8 The main issue now is whether it is appropriate to allow more development within the same area and accommodate additional open space. The Council acknowledges that the scale of development has continued to be an issue with local residents. In response, it has sought to successively bring the capacity downwards from 240 in the Working Draft Core Strategy (Examination Document CS14) to 180 homes. The Council is also working closely with the development consortium on design and layout issues through the Framework Masterplan and as part of on-going work on design objectives.

11.2.9 Technical work to date has not identified any flood risk issues. The site falls outside any flood risk zones and this is not therefore a constraint on development. The Council accepts that the proposal will need to carefully address surface water run-off due to the sloping nature of the site. The Framework Masterplan (paragraph 4.24) suggests that surface water drainage could be dealt with via on-site soakaways. There is also existing foul water sewers located close-by to serve the scheme. Infrastructure providers have not raised any specific concerns regarding local sewerage network capacities to serve this site.

11.2.10 While it is difficult to be precise over timings, an application is expected from the consortium in the Summer \ Autumn 2013.

11.2.11 The proposal has relatively good sustainability credentials, has been assessed against alternative sites, and the scheme fulfils a key role in meeting the wider housing and community needs in the town. It should be supported as a strategic site in the Pre-Submission Core Strategy (Examination Document SUB1).

11.3 Have the consequences of development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?

11.3.1 The Council is satisfied that the consequences of development on local infrastructure, as far as is practical, have been addressed. It recognises that

Berkhamsted is a relatively busy town, in part reflecting its popularity and attractiveness as a place to live, work and visit. The town's infrastructure is sensitive to growth, and there are acknowledged constraints, particularly given its valley topography and heavily built-up historic core/town centre. Care needs to be taken to ensure that utilities, services and facilities are not overloaded, particularly in respect of large-scale development.

11.3.1 The Core Strategy (Examination Document SUB1) has considered the impact of development on the local infrastructure, and carefully balanced this against many other factors, in assessing what level of growth would be appropriate for Berkhamsted and the other settlements (paras. 3.64 – 3.73 in the Background Paper – Selecting the Core Strategy Housing Target (June 2012) (Examination Document HG16) provides a useful overview).

11.3.2 The Council has worked closely with infrastructure and service providers at each stage of the Core Strategy as reflected in the work on the Infrastructure Delivery Plan (IDP) and Dacorum Strategic Infrastructure Study (Examination Documents ID1, ID3, and ID5). See also response to Issue 17 for further detail on the IDP process.

11.3.3 The information regarding expected levels, distribution and timing of development (based on the housing trajectory) was given to all providers. Any local issues have been highlighted in the Place Strategy and discussed with relevant providers. It would conclude that while there are local service and capacity issues, these can be addressed in most cases e.g. through local investment and upgrading of the network in the case of water, gas and electricity. There is no evidence to suggest that in terms of infrastructure there is any absolute constraint to the delivery of the amount of development proposed in the Place Strategy.

11.3.4 The level of growth in the Place Strategy is indicative rather than an absolute target (paragraph 19.4 in the Pre-Submission Core Strategy: Examination Document SUB1), and assumes all available opportunities come forward. In reality, as at 1st April 2012 much of the new housing has already been built or is committed (Residential Land Position Statement: Examination Document HG20) in Berkhamsted and Northchurch (resp. 491 and 101 homes), and development is likely to be spread over the lifetime of the plan. The latter should help even out demands on the infrastructure and allow it to better adjust to change. Furthermore, all new schemes will need to contribute directly and/or financially to local infrastructure to support the development (refer to Policy CS35: Infrastructure and Developer Contributions). The landowners of strategic site SS1 and local allocation LA4 are committed in each case to meeting the demands of their development on infrastructure (see relevant statements of common ground: Examination Documents SG5 and SG6).

11.3.5 The Council has worked closely over growth levels with the County Council as the local authority responsible for highways and schooling.

11.3.6 It is acknowledged that the town suffers from congestion, especially during peak

hours (as do many settlements in the Borough). There are also identified local constraints e.g. the A41 south of Berkhamsted, along Berkhamsted High Street (A4251) and at the Kingshill Way / Shootersway junction. However, no major road building is envisaged in the town over the plan period, the focus being on improving the efficiency of the current network. Furthermore, based on advice from the Local Highway Authority (Stage 1 Feasibility Report: Examination Document TR5), the Springfield Road / New Road link road is no longer being supported.

- 11.3.7 While the Local Highway Authority recognises that congestion is an issue (page 68, Assessment of Potential Local Allocations and Strategic Sites: Examination Document HG15), it has not raised any fundamental concerns in principle over the ability of the local network to accommodate the level of growth in the town and in bringing forward the SS1 and LA4 housing allocations. The Local Highway Authority has worked in conjunction with the Council and developers to assess the impact of each site and to identify appropriate access arrangements, highway improvements and funding sources. For example, options have been identified for improving the Kingshill Way / Shootersway junction and funding for this is to be principally secured through Proposal SS1.
- 11.3.8 The transport impact of new development is being addressed in a number of ways. The County Council is preparing a joint Urban Transport Plan (UTP) for the Berkhamsted, Northchurch and Tring areas. This is a more appropriate process to focus on, co-ordinate and tackle local highway issues than the Core Strategy. It seeks to address a number of existing local problems (e.g. congestion, parking, highway safety, walking and cycling, public transport etc.), through a series of schemes across all transport modes. The emphasis will be on improving accessibility and in promoting a shift to more sustainable modes of travel (as far as is possible given the local topography). The UTP will have an important role in identifying and prioritising investment in smaller transport schemes and new infrastructure over the plan period. The document is still at the draft stage. See response to Issue 3: question 3.2 for further information regarding the role of UTPs.
- 11.3.9 The Council accepts that car parking has been a long-standing concern across the town of local residents and businesses, particularly in the town centre, the residential areas surrounding it, and around the railway station. Whatever level of development is set for the town, it cannot be easily dealt with given the limited opportunities to increase capacity in the town centre, that access to the public car parks is constrained, and the competition for available spaces from a range of users. Introducing measures to control parking has and is currently proving to be controversial.
- 11.3.10 However, capacity is being addressed as far as is practical. The recent decking of the railway station car park has improved capacity and helped tackle some of the problems associated with commuter parking in nearby residential areas. The Council is also looking into opportunities to increase the amount of public car parking in the town centre. Implementation of the Local Plan Shopping Proposal SS1 (Examination Document OT1)) could also modestly increase capacity (43 spaces) in the town centre.

11.3.11 The UTP could also look into the wider issues of parking management and pricing as a means of improving the efficiency of on and off-street parking. Berkhamsted Town Council has already taken steps to introduce new controlled parking in three zones in and around the town centre (Manor Street, Park Street, and Bridgewater Road). Consultation will follow on these at the end of September 2012.

11.3.12 The Council has similarly worked closely with the County Council regarding the growth implications of schooling during all stages of the Core Strategy. This has been important in tempering decisions on the amount and location of growth in the town (primary schooling proving to be the most sensitive). The situation has recently been complicated in Berkhamsted and Northchurch with the likely move from three to two-tier schooling.

11.3.13 However, the County Council is satisfied that they can accommodate additional growth over the lifetime of the plan, through refurbishing and remodelling of existing schools in the shorter term and through the identification of the two educational zones in the Place Strategy to meet longer term demand. The latter will allow for, if required, two new 2 form entry primary schools to serve the east and west of the town. The Core Strategy (Policy CS23) takes a positive approach to the expansion of existing school sites.

11.3.14 Technical work on health care (Infrastructure Delivery Plan Update: Examination Document ID5) does not point to there being any capacity issues. In the Berkhamsted and Northchurch practices there is capacity to register up to 7,000 more patients, chiefly at the Gossoms End Surgery. This current capacity can help absorb the effects of the new homes on GP services. However, the extent to which GP services can meet demand will be dependent on how close the new housing is to surgeries.

11.4 Is there a need for additional retail and/or employment floorspace to be allocated in the town?

11.4.1 The Council does not consider that the Pre-Submission Core Strategy (Examination Document SUB1) should make direct provision for additional retail or employment floorspace in Berkhamsted. Current provision is considered to be adequate for the size and role of the town.

11.4.2 With regards to retailing, Berkhamsted mainly competes with the shopping centres of Hemel Hempstead, Chesham and Tring. The Retail and Leisure Study: Examination Document ED2) did not point to any increased role in the shopping hierarchy for Berkhamsted other than a relatively modest increase in comparison and convenience shopping. In reality, opportunities to expand floorspace are heavily constrained by its built-up nature and historic core.

11.4.3 In terms of convenience floorspace, the recently approved proposal for a Marks and Spencer "Simply Food" outlet (1,079 sqm sales floor area) at the former Royal Mail delivery office (application 4/1211/12) will absorb identified headroom. There is also scope for additional floorspace (albeit replacement) through

redevelopment of land and buildings at the Water Lane car park (i.e. Local Plan Shopping Proposal SS1: Examination Document OT1). The proposal is supported by a feasibility study (Examination Document ED2). It can deliver a replacement foodstore, additional and improved car parking, and seeks to achieve a higher quality urban design and public realm.

11.4.4 While there may be a larger theoretical demand for comparison floorspace, this is physically difficult to deliver in the town centre and parking and access is constrained. Large footprint schemes and associated servicing and parking arrangements would not fit easily within the historic pattern of building in the shopping centre. There has been no recent active operator interest in delivering sizeable amounts of non-food floorspace, and there is unlikely to be in the short to medium term given the current economic conditions.

11.4.5 Much of the comparison floorspace could be provided incrementally through smaller-scale change e.g. through extensions. The Marks and Spencer scheme also includes a small shop unit which could be used for non-food purposes (c.500 sqm). To a lesser extent, the quality of the non-food offer has also been improved with the recent re-opening of the Tesco's homewear department above their supermarket.

11.4.6 In respect of employment, the South West Hertfordshire Employment Land Update: Examination Document ED8) considered that the town had a successful office local office market and a smaller industrial warehouse sector. There was a reasonable balance in demand and supply in both cases, but there was no evidence for the need for additional floorspace. The study concluded that existing B-class uses should be safeguarded. This is reflected in the Pre-Submission Core Strategy approach which seeks to protect existing opportunities.

11.4.7 As with retail floorspace, opportunities to accommodate new floorspace is limited. While there may be some opportunities to redevelop the existing General Employment Areas, there is little scope to expand them because of physical and land use constraints (e.g. residential areas). The only scope for additional employment is in the Green Belt and there are no proposals for this. In any event, they would lead to the creation of isolated estates on the edge of town divorced from existing commercial development. The Council's approach is to protect existing supply rather than encroach into Green Belt – much of which is also Chilterns AONB.

11.4.8 The Council would stress that employment opportunities within the town are not restricted solely to B class uses. It is also important to protect other uses such as the British Film Institute, support retention / expansion of schools, and encourage other retail and commercial premises.

11.5 Should there be a specific policy for the town as a whole in order to ensure that the Council's vision will be delivered?

11.5.1 This is not considered to be necessary. The Berkhamsted Place Strategy contains a vision, followed by a series of objectives – both those common to all places and specific local objectives for Berkhamsted, and a strategy for the town.

11.5.2 The Place Strategy is intended to explain what the Council will do to achieve the vision and objectives. This is supported through policies in the 'theme' sections of the Core Strategy and will be further supported by the other documents that will comprise the Local Planning Framework e.g. specific site allocations. The Place Strategy is the one location where the policy main threads for Tring are brought together, and was considered beneficial to local communities in understanding how the planning framework related to the town.

11.5.3 It is unnecessary to have a separate policy. Separate policies are only contained for the two 'Key Regeneration Areas' within the Borough, which are both located at Hemel Hempstead (see Key Diagram, Map 1 of the Pre-Submission Core Strategy). These policies act as a framework to guide significant levels of growth and change in these locations and provide a clear context for the associated master plans.

11.5.4 What may however be helpful is for the Council to explain the above approach more clearly in section 19, which provides an introduction to the place strategies. This would be the best place to articulate the approach which is common to all place strategies.

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

11.6.1 While the Council would acknowledge that the proposed release of the site from the Green Belt for housing has raised local concerns, it considers that Proposal LA4 is fully justified on planning and sustainability grounds. The Council has worked closely with the landowners to ensure the development can be delivered (see Statement of Common Ground (Examination Documents SG6)).

11.6.2 A modest outward expansion of the town is supported in meeting local housing need. In this context, the Council has assessed various sites and opportunities over the plan period and taken account of consultation (see response to question 11.1 above). On balance this location is preferred (Assessment of Potential Local Allocations & Strategic Sites: Examination Document HG15). The local allocation has an important housing role to play (paragraph 14.22 in the Pre-Submission Core Strategy: Examination Document SS1), particularly in meeting housing need and providing affordable housing.

11.6.3 The proposal represents a modest release from the Green Belt (1.7 Ha). It will result in the spread of built development to the south side of Shootersway between the town and the A41, but the extensive boundary screening and relatively small scale (c.60 homes) will limit its impact on the Green Belt and help contain future development. The location of the site and the scale of development will also help to limit other impacts, particularly on local infrastructure.

11.6.4 The merits of the proposal have been assessed by the Sustainability Appraisal (SA) (Examination Document SUB7). It performs well against most of the sustainability criteria. The SA acknowledged some adverse environmental effects (as would be expected from any greenfield development) in terms of loss of landscape character, habitat, and soil sealing and increased transport related

emissions. However, it also identified positive effects against a number of objectives including housing, sustainable prosperity and growth, fairer access to services and revitalising town centres.

11.6.5 The Council recognises and accepts that the valley topography of the town does discourage walking and cycling. However, this is always going to be the case for this site (and any other greenfield development) positioned above the valley floor. This argument in isolation should not be used to stymie development opportunities. The proposal is reasonably well located in relation to local services and facilities, and measures to promote more sustainable travel are encouraged and can be delivered. On balance, the Council considers that the benefits of the site considerably outweigh any shortcomings.

11.6.6 The proposal has good sustainability credentials, has been assessed against alternative sites, and the scheme fulfils a key role in meeting the housing needs of the town. It should be supported as a local allocation in the Core Strategy.