

**DACORUM BOROUGH
COUNCIL CORE
STRATEGY (CS)
DEVELOPMENT PLAN
DOCUMENT (DPD)**

LDF EXAMINATION

Issue 11 – Berkhamsted

STATEMENT PREPARED BY:

**WOOLF BOND
PLANNING LLP
CHARTERED TOWN PLANNING
CONSULTANTS**

**OBJECTOR REPRESENTATION
NUMBER: 527**

SEPTEMBER 2012

Issue 11 – Berkhamsted

- 1.1. This submission has been prepared on behalf of our clients, Taylor UK Wimpey Ltd and Hertfordshire County Council, together with Egerton Rothesay School and responds to Issue 11 as above.
- 1.2. Our clients whilst in general support of the identification of the 'Land at Durrants Lane/Shootersway, Berkhamsted' as a strategic site for mixed use development have an objection to certain provisions within Proposal SS1 as to whether the proposed wording is sufficiently flexible to deliver its objectives. For the reasons set out below we do not accept that that the document is 'effective' or 'consistent with national policy' having regard to the tests of soundness set out at paragraph 182 of the National Planning Policy Framework.
- 1.3. The relevant matter listed by the Inspector for consideration at the inquiry is dealt with below having regard to the tests of soundness.

**Is proposal SS1 properly justified, particularly 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?**

- 1.4. In regard to flood risk and timetable matters we refer the Inspector to the Statement of Common Ground (SoCG) between the our clients and Dacorum Borough Council that has been submitted separately for the Inspectors attention.
- 1.5. The 'proposals' section of the policy refers to a mixed use scheme for '*180 new homes*'. Whilst as set out within the SoCG we can confirm that the site is deliverable for this number of dwellings we consider that the use of the wording '*around 180 new homes*' would be more appropriate given the need for flexibility come the time a planning application is submitted. It is at this stage that final masterplanning and survey work will be completed in addition to pre-application consultation. Subject to this work, the total number of units is subject to potential change and accordingly the policy at this stage should retain such flexibility.

- 1.6. The 'principles' section of the policy refers to a mix of two storey housing to be provided on the strategic site. We consider this should be re-worded to read *'to provide a mix of housing up to two and a half storeys'*. Such an approach would be entirely consistent with accepted design principles held nationwide when delivering strategic residential development. The opportunity to provide habitable accommodation at second floor level is a commonly applied method so to add visual interest to the wider street scene particularly in prominent positions (e.g. corners or overlooking open space). Further we note that the policy is overly prescriptive having regard to the design requirements contained within the NPPF as follows:

'Design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally' (para 59).

'Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness' (para 60).

- 1.7. It therefore follows that the specific requirement for two storey housing within Proposal SS1 is an overly prescriptive one and removes the opportunity for applicants to introduce variety by designing innovative and imaginative layouts. For these reasons we consider the above statement is not sufficiently justified or consistent with national policy such that it can be declared sound.

Suggested changes to CS

- 1.8. Accordingly we propose the following minor amendments to the document:
- Amend Proposal SS1, first bullet point under 'Proposals' to read 'Around 180 new homes'
 - Amend Proposal SS1, first bullet point under 'Principles' to read 'To provide a mix of housing up to two and a half storeys'.