

MATTER 12: TRING

12.1 Is the policy for growth and change appropriate and justified, including in relation to national guidance and local need, and in terms of economic, social and environmental impact? Is sufficient weight attached to providing employment opportunities in Tring?

- 1.1 It will be clear from our other statements that we not only support the principle of development at Tring but believe the Council has chosen the right site at Icknield Way. Following our review of the plan and its evidence base, we therefore find ourselves largely in agreement with the Council (which will not doubt take the lead in addressing this point at the examination) and have generally limited our concerns to:
- a. a fundamental objection to treating the “local allocation” at Tring as a reserve allocation; and
 - b. the suggestion that additional dwellings could be accommodated on the site if the Inspector was minded to recommend there is an additional need to do so.
- 1.2 CALA Homes has therefore already submitted to the examination a joint statement prepared with Dacorum Borough Council, which we will refer to below but have not repeated.
- 1.3 As we have said in our first statement (for Issue 2), the plan contains much to be commended. It is built on an extensive evidence base which we believe supports the principle of growth at Tring. The logic of directing development to Tring is as a direct result of its role in the settlement hierarchy (which we do not believe has been significantly challenged by consultees). Whilst Hemel Hempstead sits at the top of that hierarchy (and rightly will receive the most development), Berkhamsted and Tring stand out as a next tier of Market Towns (which are recognised as being more appropriate locations for development than the small villages).
- 1.4 One of the key determinants for settlement hierarchy (often used as a proxy for sustainable development distribution) is the scale of existing population and number of dwellings. A clear grouping can be seen in Tables 1 and 10 of the Council’s “Population: Background Note for the Core Strategy” reference BP4.

Table 1: Population, 2001 Census

Area	Population 2001	
	Resident Population	Resident household population
Dacorum	137,800	135,788
Hemel Hempstead	82,074	81,368
Berkhamsted	18,524	18,367
Tring	11,635	11,424
Kings Langley*	4,942	4,912
Bovingdon	4,611	3,903
Markyate	2,749	2,749
Countryside**	13,265	13,065

* The population figure for Kings Langley indicates those residents living in Three Rivers District, the population of the Dacorum part of Kings Langley is 3,976. We have carried out the calculations outlined below for both the whole of Kings Langley and the Dacorum part only.

** The population of the countryside is calculated by subtracting the population of all the settlements from the Borough total.

Table 10: Actual dwelling numbers by settlement: 2006

Area	Dwellings 2001	Dwellings 2006
Dacorum	55,908	58,066
Hemel Hempstead	33,397	34,785
Berkhamsted	7,790	8,078
Tring	4,694	4,899
Kings Langley ¹	2,092	2,267
Kings Langley ²	1,691	1,710
Bovingdon	1,621	1,654
Markyate	1,178	1,238
Countryside	5,128	5,366

¹ Refers to whole settlement of Kings Langley, including some residents in Three Rivers District, and uses data supplied by Three Rivers District referring to completion rates.

² Refers to the Dacorum part of Kings Langley only.

12.2 Is allocated site LA5 the most appropriate location for development in Tring when assessed against the alternatives, particularly in terms of sustainability?

- 1.5 Yes, we believe the Council's evidence base has demonstrated this. In addition we have submitted, on behalf of CALA Homes (the housebuilder that controls this site) a joint statement with Dacorum which includes a detailed landscape assessment.
- 1.6 The Council's "Assessment of Potential Local Allocations and Strategic Sites" dated June 2012 (Examination Document HG16) is the most accessible demonstration of the Council's site selection process (drawing together earlier work that we reference below). Tring is dealt with in pages 101 to 124 of HB16. The Officer conclusion on page 107

states in respect of LA5 site to the west of Tring at Icknield Way that “whilst the site is not the closest to the town centre, it is near the employment area and a local centre. Development in this location would not detract from the compact nature of the town”. We consider this to be a fair summary of the site’s relative merits when considered against alternatives.

- 1.7 The proposed allocation of the site followed an extensive sustainability appraisal process carried out at each stage of the plan making process to consider potential alternative options. The findings of this are set out in SUB3 dated September 2011. The main body of the report makes the following conclusion in respect of Tring (at para 6.7.3, page 65):

Although development on edge of town could have an adverse effect on local landscapes, leading to some uncertainty in relation to the landscape objective, safeguarding the setting and distinctive nature of Tring and views along the High Street is forecast to have a positive effect. Positive effects are also forecast for historic and cultural assets, as the unique uses of the Zoological Museum and the auction rooms will be safeguarded and the historic High Street will be protected.

Positive effects have been forecast against the majority of the social and economic objectives. Delivery of the spatial strategy should make the town a more attractive place to live and work by maintaining employment opportunities, providing housing, and protecting the key local shopping and service role of the town centre. In addition, extension of the secondary school will help to improve educational provision in the town, and delivery of new open spaces and playing fields could provide opportunities for people to adopt healthier lifestyles.

Local Allocation: Icknield Way, West of Tring

As development of site would lead to development on greenfield land, within the Greenbelt and close to the Chilterns AONB, adverse effects have been forecast for the biodiversity, soils, use of brownfield sites and landscape & townscape SA objectives. The development requirements seek to mitigate these impacts through careful layout, design, density and landscaping. This site is located near to a local centre and is adjacent to the town’s main employment area. However it is located 2 km from the town centre. This could increase the use of the car to access town centre facilities and services, thereby increasing the growth of greenhouse gas emissions and other emission to air. There is also uncertainty around the level of out-commuting that may result from building the large number of houses on this site. If this is by car

on the A41 there is the potential for increased levels of emissions.

Development of this site would provide for around 150 dwellings with the potential for affordable housing. However, the site is close to the A41, which means noise disturbance could affect the health and well-being of the new residents. Development would allow for open space; however it would not be large enough to fulfil all of the town's leisure space aspirations. Development of this site could involve the provision of some employment space, thereby helping to support the local economy. Also, the new housing on the site should help to support the local services in the town, maintaining their viability and boosting the local economy.

1.8 Further evidence on the merits of the proposed allocation can be found in SUB3 at:

- Appendix pages F26 and F27, the sustainability appraisal of the place based strategy;
- The Compendium of Sustainability Appraisal Assessment of Potential Strategic Sites and Local Allocations by Settlement (June 2012) at pages 37 to 41, and the reference to 4.4.1;
- The Compendium's appendices.

1.9 The Council's decision was clearly evidence based.

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

1.10 In considering this, it is worth bearing in mind the relatively small scale of the proposed allocation relative to Tring. Significantly, the Council has stated that the size of the allocation was aimed at maintaining the size of the settlement's existing population not increasing it (reference text below Table 11 on last page of BP4). As such, the new housing proposed must be expected to support the existing level of infrastructure rather than put additional pressure upon it (as it happens, we say that a greater number of homes are required just to maintain the existing population, see the Open House report appended to the Matter 6 Statement).

- 1.11 The development control process, with the support of other policies in the plan, is more than capable of ensuring that any adverse impacts on infrastructure arising from new development are appropriately mitigated. Significantly, the release of greenfield land is the only way to secure a significant amount of affordable housing – brownfield sites will not do this.
- 1.12 We should stress that no development is proposed within the AONB. Indeed, we are not suggesting that any of AONB should be excluded from the Green Belt. The joint statement prepared by CALA Homes and Dacorum Borough Council demonstrates that the proposed allocation only allows for development outside the AONB adjacent to the existing urban edge of Tring. A comprehensive landscape and visual assessment is appended to that joint statement within the Examination evidence and specifically addresses this question. It concludes that:

8.1 Due to the Site's relationship with the existing hard urban edge of Tring and the effect of detracting urban elements on the existing landscape character, the landscape and visual appraisal identifies that the Site has the capacity to accommodate an appropriate amount of change in the context of the adjacent urban edge with the potential to improve the condition and setting of the Chilterns AONB landscape.

8.2 The Site and its features present opportunities to improve the western urban edge of Tring and to screen detractors in the AONB landscape in views towards and out from the AONB.

8.3 When developing a greenfield Site adjacent to an existing urban edge there will inevitably be adverse effects on local receptors. The proposals for the Site should respond to the landscape recommendations above in order to ensure that the significance of effects on site features, landscape character and visual receptors is reduced and that relevant national and local planning policies and objectives are adhered to. The assessment of effects should be reviewed once a detailed masterplan for the Site has been developed.

8.4 An initial Landscape Development Principles Plan (Figure 4) has been prepared to summarise the landscape opportunities and constraints within the Site and to inform the a masterplan for the Site.

12.5 Has the Council satisfactorily addressed the need for leisure and sporting facilities in Tring? Is Ickneild Way the most appropriate location for new playing fields?

- 1.13 CALA Homes has been open in expressing its willingness to provide land for new sport facilities in paralleling to providing new housing and employment. We understand this to be a particular local aspiration. We see the logic and merit of the site given:
- a. its close proximity to the urban edge and accessibility to those living in Tring; and
 - b. the appropriateness of this type of activity in the Green Belt.
 - c. existing facilities are concentrated to the east of the town and provision to the west would compliment this.

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

- 1.14 We can see the merit of this but do not believe its absence brings into doubt the soundness of the plan.

Conclusion

- 1.15 We believe the site is appropriate and should be allocated immediately for development.
- 1.16 We raise one final point of concern about the detail of the proposed allocation.
- 1.17 It has been suggested that the council may look to this site to accommodate Gypsy and Traveller pitches with reference to CS22. Any such requirement would undermine the viability and deliverability of this site (or for that matter any other in our experience) and we would ask Officers to withdraw that suggestion at the Examination. Officers have suggested that a reading of CS22 would indicate that priority should be given to the provision of Gypsy and Traveller sites on the local allocations identified in the plan, we believe this to be a disingenuous suggestion which does not accord with any reasonable reading of the policy. The situation needs to be rectified given it would undermine the viability and deliverability of the site at Tring and sites elsewhere.