



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Issue 12: Tring

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

- 12.1 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? Is sufficient weight attached to providing employment opportunities in Tring?
- 12.2 Is allocated site LA5 the most appropriate location for development in Tring when assessed against the alternatives, particularly in terms of sustainability?
- 12.3 Have the consequences of development on local infrastructure (including highways, car parking, schools and health services) been satisfactorily addressed?
- 12.4 Is sufficient protection afforded to the AONB and the overall setting of the town?
- 12.5 Has the Council satisfactorily addressed the need for leisure and sporting facilities in Tring? Is Icknield Way the most appropriate location for new playing fields?
- 12.6 Should there be a policy for the town as a whole in order to ensure the Council's vision will be delivered?

Dacorum Borough Council's Response

- 12.1 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? Is sufficient weight attached to providing employment opportunities in Tring?**
- 12.1.1 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 Tring.
- National guidance**
- 12.1.2 Achieving sustainable development is the Government's stated purpose for the planning system (paragraph 6 of the National Planning Policy Framework): it is elaborated in sections 1-13 of NPPF.
- 12.1.3 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).
- 12.1.4 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.” (Paragraph 10 NPPF). Furthermore, “Local plans are the key to delivering sustainable development that reflects the visions and aspirations of local communities.” (paragraph 150 NPPF)

12.1.5 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.

12.1.6 These principles underpin and are articulated in the Core Strategy. The Council has looked at the role of each place within this context and outlined what it considers to be the most appropriate strategy.

12.1.7 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 question 2.1 in Issue Paper 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt).

12.1.8 Tring 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

12.1.9 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

12.1.10 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.

12.1.11 The approach to homes and jobs within Tring 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).

12.1.12 For Tring, key recommendations are as follows:

Employment – There are three General Employment Areas (GEAs) in Tring – two relatively small sites at Akeman Street and Brook Street and a larger site at Icknield Way. These GEAs play an important role in offering local job opportunities and there is a case for avoiding reductions in employment stock, and even increasing that stock. This could be achieved through retention of existing capacity for B-class uses and replacement of any loss (such as through the redevelopment of the Akeman Street GEA) through new allocations. The preferred location for new provision is through an extension of the existing Icknield Way GEA. It is also appropriate that the Place Strategy recognises the need for more flexibility in type of jobs provided (e.g. through any redevelopment of the Akeman Street General Employment Area) to assist options for reuse of buildings (which will be formalised in the Site Allocations DPD). Jobs are also provided by Tring Museum – part of the Natural History Museum.

Retail – Tring has a vibrant town centre, with a Marks and Spencers Simply Food and numerous smaller shops, restaurants and cafes. There is a Tesco supermarket on the edge of the town near Dunsley Farm. The latest retail assessment suggests that allowance should be made for a small element of retail growth i.e. 2,500 square metres (net) of comparison floorspace and 750 of convenience, but this will result in little significant overall change over the plan period. Retail adds to the supply of local employment opportunities.

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 Tring'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 480 new homes between 2006 and 2031. The need for the outward expansion of town has

been considered and realistic options for this expansion weighed up through consultation on Site Allocations DPD (Examination Documents SA1 and SA5), Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15) and through the Sustainability Appraisal work (Examination Document CS19). See response to Issue 12.2 below for further information regarding site options and the process of site selection.

Policy CS19: Affordable Housing sets a lower threshold for on-site delivery of affordable homes in Tring that at 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, Green Space Strategy and Green Infrastructure work (respectively 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 Tring Vision Diagram and reflected in the Place Strategy. This structure includes urban and strategic wildlife corridors, open land, green gateways and urban design zones. The Grand Union Canal is an important strategic wildlife corridor to the north of the town. The town is surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB) and Tring Reservoirs to the north are designated as a Site of Special Scientific Interest (SSSI). Tring Park provides an important landscape setting.

Infrastructure – Through technical work (especially the Infrastructure Delivery Plan – 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.

The level of development proposed (i.e. the 480 local housing figure) is accepted by the County Council in terms of service issues. Primary schools within the town can accommodate the estimated increase in pupil yields through latent capacity. In terms of secondary provision, Tring School currently has eight forms of entry. Even with the provision of detached playing fields, the County Council's preference is for the school to remain at this size, rather than expand to ten forms of entry. Such expansion is however possible and is therefore referred to in the Place Strategy. The latest position is reflected in minor change MC90. The school currently attracts children from across the border in Buckinghamshire. However, as more children from the Tring begin to require places, the school will increasingly draw its catchment from the town.

There are two doctors surgeries within the town. Both are expected to be able to

support growth up to a combined total of 5,000 new registrations. Secondary healthcare facilities are provided by Hemel Hempstead Local General Hospital. Stoke Mandeville Hospital is also nearby. See also response to question 12.3 below.

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

Consultation

12.1.14 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).

12.1.15 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.

12.1.16 The top five priorities for Tring were identified as:

- Improve local facilities
- Affordable housing
- Parking
- Retain the town's character; and
- Encourage commercial enterprise and local employment.

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

12.1.17 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.

12.1.18 Two options for the outward expansion of the town were put forward:

- i. West of Tring (Icknield Way);and
- ii. East of Tring (land at Dunsley Farm).

12.1.19 Other potential options were listed together with the reasons for them being rejected. Land north east of Tring (Marshcroft Farm) was rejected as it would not

relate well to the compact nature of the town. Options to the south and south west were rejected as they would breach a strong countryside boundary and parts fall within the Chilterns Area of Outstanding Natural Beauty. Options to the north and north west of Tring (including the site known as Waterside Way) were rejected as they breached a very strong northern boundary to the town (the Icknield Way), would have a negative impact on environmental designations such as Tring Reservoirs (a SSSI) and would detract from the compact nature of the town.

12.1.20 The public supported the vision for the town but opposed the strategy on the grounds of the level of housing growth proposed. There was opposition to both Green Belt housing options, with Dunsley Farm receiving the most objections. Landowners of rejected sites reiterated why these should be included in preference and a new location was put forward (land at Gamnel Farm, New Mill). There was strong support for protecting and enhancing key built and environmental assets. The public agreed that Akeman Street General Employment Area could accommodate a wider range of uses and supported the protection of the market, auction rooms and Natural History Museum.

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

12.1.21 In this version of the plan, feedback was sought on the proposed Tring Place Strategy including two housing options (set at 330 and 480 new homes). The housing option had been narrowed down to land to the west of Tring and development of this site was assumed as part of the higher dwelling option.

12.1.22 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

12.1.23 There was broad public support for the west of Tring allocation, but concern was raised over its impact on the Chilterns Area of Outstanding Natural Beauty and the Green Belt. There was opposition to the Tring Place Strategy mainly on the basis of the level and location of new development. There were mixed views over the plans for additional playing fields.

(d) Citizen's Panel

12.1.24 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.

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

Sustainability Appraisal

12.1.27 Sustainability Appraisal (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 Document SUB3. While the Sustainability Appraisal highlighted some negative effects of new housing in the town on infrastructure, natural resources and the environment, it did forecast a number of positive impacts in terms of safeguarding the setting of the town, views along the High Street, and historic and cultural assets such the Zoological Museum. 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 shopping and service role of the town centre.

12.1.28 Account was also taken of the Habitat Regulations Assessment (HRA) (Examination Documents SUB4 and CS7). The HRA pointed out that the removal in the Core Strategy of the consideration of major development sites in Tring (and the other towns) should reduce the risk of disturbance to the Chilterns Beechwood Special Area of Conservation (SAC). While suggested current development opportunities at Tring 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

12.1.29 Tring is a small market town with some distinctive features which the Council intends to support – e.g. National History Museum and Pendley Theatre (in the adjoining countryside). It is a compact, constrained town – surrounded by farmland and attractive countryside, large parts of which are within the Chilterns AONB or protected by other designations e.g. SSSIs at Tring Park and Reservoirs. It lies below the Chilterns scarp slope, along which runs the Ridgeway National Trail.

12.1.30 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 6.4, Examination Document EN6), with the consequent need to accommodate more playing fields and informal open space.

12.1.31 The town's urban structure, character and biodiversity are recognised in the Vision Diagram. The Grand Union Canal to the north of the town is an important strategic wildlife corridor. Tring Park is an important area of open land to the south of the town and provides an important landscape setting.

12.1.32 The scope for change within Tring is limited – the trend is for small scale redevelopment and conversions to residential use. The town centre is relatively compact and only a small change in retail development is anticipated. There is a relatively high provision of cafes and restaurants, befitting a town that attracts some visitors.

12.1.33 Existing employment provision should largely be retained, with any losses being replaced. However, it is appropriate that the Place Strategy recognises the need for more flexibility in type of jobs provided (e.g. through any redevelopment of the Akeman Street General Employment Area) to assist options for reuse of buildings (which will be formalised in the Site Allocations DPD). There is expected to be some knock-on loss for (B class) employment, and therefore it is important to offer new and relocation opportunities.

12.1.34 The key issue has been how far outwards the town should expand and how would this change the character of the town. Substantial levels of development can only be achieved by addition of new estates on the Green Belt. The Council is reluctant to extend the town, but considers that population stability is unlikely to be maintained without it. A modest greenfield site will provide other sources of local homes. It is considered on balance LA5 (Icknield Way) offers the best solution (see response to question 12.2 below). 40% of the homes on this site will be affordable.

12.1.35 The Chilterns beech woodlands 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 unnecessarily damaging the Special Area of Conservation (SAC) through incremental development.

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

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

12.2.1 The Council has assessed all of what it considers to be the appropriate alternatives for the outward expansion of the town (including variations in scale at different locations). This includes:

- i. Land to the west (Icknield Way)
- ii. Land to the east (Dunsley Farm)
- iii. Waterside Way
- iv. Tring Sports Forum proposal at Dunsley Farm
- v. Land adjacent to Station Road (north and south)

12.2.2 This assessment has been carried out through the Sustainability Appraisal process (Examination Document CS19) and the Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15). The latter considered a range of issues including deliverability, impact on the wider Green Belt, and ability to support the emerging vision for Tring. It also took into account

the results of the sustainability assessment (Examination Document CS9). Sites have also been tested through consultation on the Site Allocations DPD (Examination Documents SA1 and SA5).

12.2.3 This process enabled the Council to narrow down the alternatives to a choice between LA5 (Icknield Way) and land to the east at Dunsley Farm. As summarised under question 12.1 above, alternative sites to the north (including the land known as Waterside Way) was discounted due to the breaching of a clear, historic boundary to the town (Icknield Way) and the impact any breach of this boundary would have upon the SSSI at Tring Reservoirs and the overall landscape setting of the town. Land to the east, off Station Road and at Marshcroft Farm, was also discounted due to some of the areas falling within the Chilterns Area of Outstanding Natural Beauty and the impact development in this location would have on the compact nature of the town. Alternative land to the south was discounted due to their impact on the Chilterns AONB, the landscape setting of the town and the absence of any new defensible Green Belt boundary. This included a large scale development option at Dunsley Farm promoted by the Tring Sports Forum. This involved the relocation of Tring School and did not have the support of the landowner – Hertfordshire County Council.

12.2.4 LA5 (Icknield Way) was chosen on balance, in the context of all available information. As the Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15) concludes, *“Options 1 (Icknield Way) and 2 (Dunsley Farm) are both considered suitable for development. However, development on Option 2 may have a negative impact on the green gateway into Tring. Option 1 is therefore recommended as the preferred site.”* Icknield Way also benefits from a more defensible Green Belt boundary.

12.2.5 Site LA5 performs well against most of the sustainability objectives (Examination Document SUB3). The sustainability appraisal acknowledged some adverse environmental effects (as would be expected from any greenfield development) in terms of some landscape (i.e. potential impact on the Chilterns Area of Outstanding Natural Beauty), loss of habitat, increased traffic and gas emissions etc. However, it also recognised the benefits of the allocation in relation to the additional homes provided, in meeting local housing needs, including affordable housing, the opportunities for additional open space and employment. The new housing was seen as helping to support the local services in the town, maintain their viability and boosting the local economy. It was also the preferred location by local residents. LA5 is a deliverable option, having the support of a national house builder (Cala Homes). It will deliver a range of benefits to the town including 150 new homes (of which 40% will be affordable), playing fields and open space, an extension to the Icknield Way Industrial Estate and potential extension to the cemetery.

12.2.6 The statement of common ground prepared by the Council and Cala Homes provides further information (Examination Document SG3). A preliminary

Landscape Assessment (Examination Document JS12) has been prepared and concludes that whilst this development will have an impact upon the landscape, these can be mitigated and the benefits of the scheme will outweigh any negatives. The study acknowledged the need to progress the assessment in more detail through a masterplan and landscape strategy. A SANG (suitable alternative natural greenspace) could be provided, as recommended by the Habitats Regulations Assessment (Examination Documents SUB4 and CS7) – albeit of a different habitat type.

12.2.7 In the light of the above factors, it is considered that Local Allocation LA5 is the most appropriate location for the outward expansion of Tring.

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

12.3.1 The Council is satisfied that the consequences of development on local infrastructure, as far as is practical, have been addressed. It recognises that Tring 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 in relation to secondary schooling and its heavily built-up historic core/town centre. Care needs to be taken to ensure that utilities, services and facilities are not overloaded.

12.3.2 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 Tring and the other settlements (paragraphs 3.64 – 3.73 in the Background Paper – Selecting the Core Strategy Housing Target: Examination Document HG16) provides a useful overview).

12.3.3 The Council has worked closely with infrastructure and service providers at each stage in development of the Core Strategy and this engagement is reflected in conclusions within 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 IDP process.

12.3.4 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. Whilst there are some local service and capacity issues, these can be satisfactorily addressed 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 at Tring.

12.3.5 The level of growth in the Place Strategy is indicative rather than an absolute target (see paragraph 19.4 in the Pre-Submission Core Strategy: Examination

Document SUB1), and assumes that all available opportunities come forward. In reality, as at 1st April 2012 some of the new housing has already been built or is committed (Residential Land Position Statement: Examination Document), 80 and 72 homes respectively, and development is likely to be spread over the lifetime of the plan. This includes delaying the release of local allocation LA5 until later in the plan period. This phased release of sites 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 in accordance with Policy CS35: Infrastructure and Developer Contributions.

12.3.6 With regard to key development sites, the impact upon infrastructure of local allocation LA5 is considered in section 9 of the joint planning statement which forms part of the Statement of Common Ground between Cala Homes and the Council (Examination Document SG3). This concludes that all utilities are available in the vicinity of the site and can be extended to serve the proposed development.

12.3.7 The Council has worked closely with the County Council as the local authority responsible for highways and schooling when discussing appropriate growth levels for the town.

12.3.8 It is acknowledged that the town centre and the area known as the 'Tring Triangle' (the Conservation Area) suffer from some congestion, especially during peak hours. This is largely due to its historic pattern of narrow streets that are part of the town's unique character. While the Local Highway Authority recognises this issue (see 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. The Local Highway Authority has worked in conjunction with the Council and developers to assess the impact of local allocation LA5 to identify appropriate access arrangements and any potential highway improvements. No major road building is envisaged in the town over the plan period, the focus being on improving the efficiency of the current network.

12.3.9 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, and 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. See response to Issue 3: question 3.2 for further information regarding the role of UTPs.

12.3.10 The Council accepts that the town centre can be busy and car parking difficult at times, particularly when the market is held. Off-street car parks in town centre are

managed by the town council. No concerns have been raised by them regarding any operational or capacity issues. Residents' parking is already in place within the 'Tring Triangle' in order to address on-street parking pressures. 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. The UTP can consider the wider issues of parking management and pricing as a means of improving the efficiency of on and off-street parking.

12.3.11 Improvement have recently been made to pedestrian and cycle links between the town and railway station (in accordance with the Dacorum Cycling Strategy Examination Document TR3) to help encourage modal shift.

12.3.12 The Council has worked closely with the County Council regarding the growth implications of schooling. Both parties are satisfied that they can accommodate additional growth over the lifetime of the plan (see response to question 12.1 above). Tring secondary school is currently an eight form entry school and cannot expand further unless detached playing fields are provided. Whilst detached playing fields are not ideal, they provide a workable solution should the County Council decide to expand the school beyond its current size. The Place Strategy gives flexibility for this to occur, should it prove necessary.

12.3.13 No issues have been raised by the Primary Care Trust during the course of consultation. Technical work on health care (Infrastructure Delivery Plan Update: Examination Document ID5) does not point to there being any capacity issues. Tring's GP practices are assessed to have capacity to register up to 5,000 more patients. This capacity can help absorb the effects of the new homes on GP services.

12.4 Is sufficient protection afforded to the AONB and the overall setting of the town?

12.4.1 Yes. The scale of change at Tring is limited for the reasons set out in response to question 12.1 above and with regard to Issue 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt). Limiting the scale of development and change will limit the impact on the landscape directly and indirectly (e.g. from activity such as traffic movement).

12.4.2 With regard to the town as a whole, there are specific policies within the Pre-Submission Core Strategy to protect the Chilterns AONB (Policy CS24 Chilterns Area of Outstanding Natural Beauty) and wider landscape (Policy CS25 Landscape Character). Saved policies from the Dacorum Borough Local Plan (Examination Document OT1) will also continue to apply until superseded (e.g. Policy 96 Landscape Strategy and Policy 98 Landscape Regions). A Landscape Character Assessment (Examination Document EN2) has been prepared for the whole borough and adopted as supplementary planning guidance. This guidance will inform all relevant planning decisions.

12.4.3 LA5 is the greatest single area of change at Tring. This proposal comprises a

natural extension to the western limit of the town. It will also secure the future of the fields adjacent to the A41 roundabout, which are within the Chilterns AONB, in open space use. While the management of this land will be subject of work on a master plan it is probable that a mix of formal and informal space will be pursued. The informal space can perform the function of a SANG (suitable alternative natural greenspace). It is important to note that the Chilterns Conservation Board have raised no objections to the allocation of LA5. They will be a key consultee when progressing the master plan for the site.

12.4.4 The Council will use the Chilterns Buildings Design Guide (Examination Document EN9) to aid the design of this development, to reflect its location on the edge of the Chiltern AONB. Positive land management will enhance this part of the AONB and the Green Belt.

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

12.5.1 Yes. See response to Issue 8 for a summary of the technical work carried out regarding leisure and sports facilities. Tring Sports Forum have independently been promoting a new sports complex (involving the re-siting of the secondary school and existing public sports facilities) on land at Dunsley Farm. However, this did not have the support of the landowners, Hertfordshire County Council and is therefore not considered to be a deliverable option.

12.5.2 Minor change MC91 has been put forward to offer flexibility and opportunity and recognise the existing sports community in the Tring Place. This change acknowledges local interest in improving indoor and outdoor sports and offers broad support for local investment in sports facilities.

12.5.3 Icknield Way is considered to be an appropriate location for playing fields and informal space. The Open Space Study (Examination Document EN6) identified that there is a shortage of public open space in the town and on its western side. Proposal LA5 offers an opportunity to help address this shortfall.

12.5.4 The Statement of Common Ground drawn up between the Borough and County Council (Examination Document SG4) refers to land in the County Council's ownership at Dunsley Farm as another alternative site for additional playing fields, as this is an appropriate Green Belt use.

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

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

12.6.2 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.

12.6.3 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.

12.6.4 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.