

Dacorum Borough Council  
Core Strategy Examination

Representor ID: 620224

**ISSUE 12: TRING**

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## **1. INTRODUCTION**

- 1.1 Emery Planning Partnership is instructed by Waterside Way Sustainable Planning Limited to attend the Examination into the Dacorum Core Strategy. This statement deals specifically with Issue 12 (Tring). The statement is based on the questions set out on the draft timetable dated 14<sup>th</sup> August 2012.
- 1.2 Our submissions to Issue 2 and 6 raise objections to the level of development to be provided to Dacorum as a whole and to Tring specifically. Our considered view is that Tring should accommodate a greater level of development to meet the town's natural growth over the plan period. We also take issue with the level of Green Belt revision around the town which will simply not meet the housing needs of the town in the plan period and beyond.
- 1.3 Waterside Way is a deliverable site which is available, suitable and achievable and can assist Tring in meeting its natural growth over the plan period. In previous submission we submitted a number of environmental and technical reports to the Council. These are appended to this statement as they demonstrate the deliverability of the Waterside Way site. We also provide the Waterside Way Schematic Masterplan which provides further detail on the proposed development.

## **2. GROWTH AND CHANGE IN TRING**

- 2.1 In answer to Question 12.1, we do not consider that the policy for growth and change for Tring is appropriate or justified.
- 2.2 Firstly, the requirement of 480 dwellings is to maintain the current population of the town. This is not providing for the natural growth of the town which would equate to 939 dwellings. This figure is set out in Document BP4 (Population: Background Note for the Core Strategy) and is also set out in paragraph 3.4 of the Spatial Strategy for Tring in the 2009 Core Strategy, which stated:

*"A certain amount of development and change will be required to maintain the town's existing vitality. Our view is that a minimum of 465 dwellings would maintain the current level of population and a maximum of about 939 dwellings would be sufficient to accommodate natural growth (2006-2031)".*

- 2.3 The Council's position has remained through to the Submission stage that the minimum figure should be the requirement which will maintain the current level of population. Our objections to date consider this to be inappropriate as the town should be providing for natural growth. To do otherwise would stifle the growth of the town and its future prosperity.

- 2.4 BP4 states that the projections were based on the 2004 based household projections. Since then the household projections have been revised twice and there has been a 19.5% increase in the total households for the Borough as a whole. On that basis the data in BP4 and on which the figure of 480 dwellings for Tring has been based is out of date.
- 2.5 The higher figure of 939 dwellings was based on zero-net migration (BP4 - Table 2). We consider it is only appropriate that a town should meet its natural housing growth and to not do so would result in the local population having to look elsewhere to live.
- 2.6 The main reason why a lower level of growth has been provided for in the Core Strategy is set out in paragraph 3.77 of HG16. This states that an increased housing rate would impact on the setting of towns and villages and their local character, particularly on the urban fringe. Reference is then made to areas quite sensitive to change e.g. around Berkhamsted and Tring because of their proximity to the AONB, effects on farmland, and impact on the setting of these towns.
- 2.7 The DCA Housing Need Survey (HG17) does not provide a specific figure for open market and affordable homes in Tring. We find this surprising as there needs to be a clear understanding of what the needs are in each town. Without it how can the distribution of development be developed and the need met?
- 2.8 Page 189 of SUB1 states that the local objective for employment is to maintain the current level. This is a rather short-sighted view on the future viability of Tring and we consider that additional land should be provided to enable the town to grow.
- 2.9 In addition some of the sites in the SHLAA are existing employment sites. Therefore even if the existing levels are to be maintained, the employment land will need to be replaced within Tring to ensure the town remains as sustainable as possible. Waterside Way would provide an opportunity to provide additional employment land, which was recognised on page 116 of HG15.
- 2.10 Therefore the intention of the Council for Tring is to maintain the current population and employment levels in Tring over the plan period and in answer to Question 12.1 there is no policy for growth in the town. This pessimistic policy is clearly contrary to NPPF and the Government's overall objective of Planning for Growth.

### **3. SITE SELECTION AT TRING**

- 3.1 Question 12.2 asks whether LA5 is the most appropriate location when assessed against the alternatives. We now set out our position with regard to Waterside Way and LA5. As noted above we consider the requirement for Tring should be higher therefore there is a

compelling case for both sites. Even so we maintain that Waterside Way is the most appropriate location for development at Tring for the following reasons.

- 3.2 Waterside Way has been assessed in a number of documents. The conclusion of the officers in the background document titled "Assessment of Local Allocations and Strategic Sites" (October 2010) are as follows:

*"Part of the site is adjacent to the AONB. There are some clearly defined boundaries to the site, however the form of the development would impact on the current compact nature of the town. It is understood to be available for development straight away and the landowners consider it has potential to offer open space, a marina with employment space and outdoor pitches for local football clubs. In terms of sustainable development this site is not the closest option to the town centre and does not have any local shopping facilities close by, but it is quite near to the main employment area. It is recommended that the site is rejected because of the impact upon the existing compact nature of the town, combined with the impact upon the adjacent AONB".*

- 3.3 A more recent assessment was undertaken in HG15 and the conclusions are identical to the 2010 assessment. The two reasons against Waterside Way are the impact upon the existing compact nature of the town, combined with the impact upon the adjacent AONB. In our previous submissions we sought to address these issues and we do so again.

## **Landscape and Visual Impact**

### **Waterside Way**

- 3.4 HG15 states that development of this site would breach the strong physical boundary of Icknield Way. However the residential development to the east of the site has already breached this boundary. In addition the Waterman Study (Appendix EPP2) assesses the site against the Landscape Character Assessment for Dacorum: Supplementary Planning Guidance dated May 2004 (Document EN2). The conclusion of Waterman (paragraph 3.23) is that the site is more closely associated with the rural urban fringe of Tring than that of the wider undulating countryside to the north and west. As a result, it has little intrinsic value to the setting of the Chilterns AONB.
- 3.5 In addition, due to the site's sloping topography, association to the existing urban area of Tring and separation by the Grand Union Canal it is not considered to be integral to the setting of the Chilterns AONB to the north, which is distinctly different in character to that of the site itself. We therefore consider that using the proximity of the AONB as a reason for not identifying this site for development is not valid.

## Site LA5

- 3.6 LA5 is open countryside and slopes from the western edge of Tring towards the roundabout to the west. The site is within the Green Belt and is immediately bounded to the west and south by the Chilterns AONB.
- 3.7 The site has been assessed along with other potential sites in HG15. The assessment states:
- "There are no clearly defined boundaries for the area required for development, other than existing field boundaries which also mark the boundary of the AONB. The site is understood to be available for development straight away. It has the potential to offer open space, employment space and additional cemetery space, in addition to new homes. 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".*
- 3.8 A Landscape and Visual Assessment has been prepared for the site and is dated August 2012. This is another example of evidence being produced to substantiate decisions in SUB1 rather than informing it. This in our view is a substantial flaw with the process.
- 3.9 Whilst we accept that Green Belt releases are required it is clear that LA5 has significant landscape and visual issues. This is addressed in the Tyler Grange Report enclosed as Appendix EPP7 which is an independent view on the work carried out at Waterside Way and LA5. On that basis we question its inclusion in SUB1 over Waterside Way.

## Green Belt Boundaries

- 3.10 When reviewing Green Belt boundaries, the test in NPPF is to use "*physical features that are readily recognisable and likely to be permanent*". For example page 103 of HG15 states that LA5 is "*part of a larger site (T/h4)*". LA5 will have a detrimental effect on the Chilterns AONB as there is no physical separation between it and the adjacent AONB which is on two sides. The boundary between the site and the AONB is a hedgerow. However Waterside Way is wholly self-contained by the Wendover Arm of the Grand Union Canal to the north, existing residential development to the east, Icknield Way to the south and Tring Corinthians to the west.
- 3.11 It is considered that Green Belt releases to north of Tring would not result in a conflict with paragraph 80 of NPPF which sets out the five purposes of including land in Green Belts. The release of Waterside Way would not result in the unrestricted sprawl of large built up areas. It would also not prevent neighbouring towns from merging into one another.
- 3.12 The third criterion is to assist in safeguarding the countryside from encroachment and the fifth criterion is to assist in urban regeneration. The Council accepts that Green Belt land

will be required and encroachment of the countryside will be a consequence of meeting Tring's housing need.

- 3.13 The fourth criterion is to preserve the setting and special character of historic towns. The landscape and visual assessment of the Waterside Way site states that the site is seen as being within the setting of the town and its development would not harm the town's setting.
- 3.14 Therefore, account must be had to releasing an appropriate level of land from the Green Belt to 2031 and beyond. As noted above, we consider that Waterside Way is an appropriate site for release as it would not conflict with the criterion in NPPF and rolling the boundary back to the Wendover Arm would ensure that the new boundary is one that will endure, as required by paragraph 85 of NPPF.

## **Accessibility**

### **Waterside Way**

- 3.15 The site is well served by bus services. The nearest bus stops to the site are located on Grove Road, which are approximately 400 metres from the site access. The bus stops are served by three main bus services, providing a frequent service to a range of destinations, notably to Tring railway station. There is also the potential for bus penetration into the site.
- 3.16 The nearest railway station to the site is Tring railway station, which is located on Station Road, to the east of the town of Tring. The railway station is located approximately 3.5km from the site, via the local road network. Tring railway station is served by a frequent train service available throughout the day, to a number of destinations, notably London Euston which can be reached in approximately 40 minutes.
- 3.17 The site is also well located for cycling. There would be two key cycling routes available to the prospective residents at Waterside Way providing access from Icknield Way to Tring railway station as well as the town centre.
- 3.18 There is an existing network of footways available from the site, particularly leading south from the site into Tring, providing access for pedestrians to facilities within the town. The site access proposals include footways into the site and a pedestrian crossing on Icknield Way to provide pedestrian access to the town. Tring town centre is located within the 2.0km isochrone from the site, and the associated facilities are therefore within a reasonable walking distance of the site.

- 3.19 It is proposed that the site access will be in the form of a simple priority junction with Icknield Way. The proposed site access has been assessed for capacity and it has been found to operate with significant spare capacity for all scenarios assessed.
- 3.20 Document HG15 sets out the distances for each of the sites to key services and facilities. For ease of reference these are set out in the table below.

**Table 1**

	Land to the west (LA5)	Waterside Way
Town Centre	1726.41m	1862.76m
Local Shop(s)	993.60m	1794.99m
Nearest Bus Stop	Adjacent to site	410.27m
Railway Station	4472.49m	3576.66m
Primary School	1181.70m	1294.44m
Secondary School	2442.62m	2013.94m

- 3.21 As can be seen there is negligible material difference between the two sites. Indeed Waterside Way is closer to the railway station and secondary school. In light of this we cannot understand the Council's assessment that LA5 would not impact on the compact nature of the town whilst Waterside Way would.

### **Community Support**

- 3.22 It is of note that Waterside Way has the support of members of the local community as set out in HG15 which states:

*"Option not included in Emerging Core Strategy consultation but has been strongly promoted by the landowner and was supported by a number of consultation responses".*

- 3.23 Despite this level of support for a development site it was not carried forward.

### **Social and Economic Benefits**

- 3.24 Waterside Way is available for development and in addition to new housing can provide a range of other social and economic benefits. These can be clearly seen and explained in the Illustrative Masterplan enclosed as Appendix EPP1.

## **Marina**

- 3.25 Waterside Way is a unique development opportunity for Tring as it is located beside the Wendover Arm of the Grand Union Canal. This is an underutilised resource and its enhancement can only assist the vitality and viability of the town. As part of our proposals we propose a marina for leisure use including a café and public access with seated areas. This proposal has the support of British Waterways and would create a strong economic and social benefit for the town.

## **Sports Facilities and Open Space**

- 3.26 Question 12.5 asks whether the Council has satisfactorily addressed the need for leisure and sporting facilities in Tring and whether Icknield Way is the most appropriate location for new playing fields. Page 33 of the Open Space Study (EN6) states:

*"Tring has a smaller area of open space per 1000 population compared to Hemel Hempstead and Berkhamsted. It has a relatively large proportion of private sports clubs and schools. Like Hemel Hempstead, the provision of children and young people facilities in Tring is below the standard set in the Local Plan. Tring Park is the largest single open space highlighted in the Borough: it provides opportunities for informal countryside leisure space, and should be maintained for informal recreation."*

- 3.27 Therefore there is a need for further open space and leisure development at the town. This is reflected in the proposals for Waterside Way. This includes new and enhanced pitch provision and associated infrastructure for Tring Corinthians FC. The Corinthians existing pitch is to the west of the site and there is no scope for expansion. The allocation of Waterside Way would provide for that expansion and enable the club to grow. This aspect of the proposal received significant support from the local community during the consultation process for the Emerging Core Strategy.
- 3.28 The proposals for Waterside Way can evolve therefore it could also provide for the employment needs in the town which has not been addressed to any extent by the Core Strategy.

## **Conclusions**

- 3.29 For the reasons set out in the paragraphs above it is clear that the council's assessment of the site is not technically robust and any concerns can be addressed and the site should now be included in the Core Strategy.

#### **4. APPENDICES**

- EPP1. Waterside Way Schematic Masterplan
- EPP2. Waterman Landscape and Visual Assessment
- EPP3. Waterman Agricultural Land Quality Assessment
- EPP4. BSP Access and Transport Assessment
- EPP5. BSP Flood Risk and Drainage Assessment
- EPP6. Tyler Grange Landscape Report September 2012