

Dacorum Borough Council Core Strategy Examination in Public 2012

AMEC on behalf of Trustees of Piers Williams (ID: 502504)

Hearing Session and Issue: Wednesday 17 October 2012 10.00 Issue 12: Tring

WRITTEN SUBMISSION

Context

This Position Statement is in response to questions raised by the Inspector which are considered relevant to our client's land interests at Station Road, Tring under Issue 12 Question(s) 12.1 and 12.2.

Issue 12: Tring

Question 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?

It is considered that the policy for growth provided in the Tring Place Strategy is unsound for the reasons outlined below:

- **The policy for growth and change is not sufficiently positive or flexible.**

The strategy for Tring sets out that provision would be made for around 480 new homes in Tring between 2006 and 2031. To deliver this housing growth the Plan outlines proposals for around 150 new homes at Icknield Way, west of Tring. The Housing Land Availability Paper (July 2011) outlines that in order to deliver the 480 homes, after taking into account the new allocation of 150 dwellings and existing commitments, land for around 100 new homes on 'unidentified locations' i.e. windfalls still needs to be found to meet the requirement to 2031.

It is considered that insufficient land for development has been identified in the Core Strategy to meet housing needs (see our response to issue 6). Given the scale of growth required to meet development needs it is considered that the Core Strategy will need to set a higher housing target and subsequently increase the delivery of housing throughout the Borough, including the identification of more sites in Tring. The east provides the most sustainable direction for growth and should be given greater consideration the Core Strategy and the emerging Site Allocations DPD (see response to question 12.2 below).

The emphasis of NPPF is to ensure local plans are *positively prepared* (paragraph 182) and **significantly boost housing supply** (paragraph 47). This also requires local planning

authorities to identify a specific supply of developable sites or broad locations for year 6-10 and, where possible, for years 11-15 and update this annually. In addition, local plans should be **sufficiently flexible to adapt to rapid changes** (paragraph 14).

Whilst we generally support the overall strategy and level of growth as a minimum, we feel that additional land should be allocated in Tring, through the Core Strategy. Alternatively, provision in the Core Strategy should be made for smaller sites to be allocated in the Site Allocations DPD in order to provide positive a growth strategy which is sufficiently flexible in line with the emphasis of NPPF as outlined above.

Paragraph 182 sets out the four tests for soundness against which local plans will be assessed. This includes the tests of **'positively prepared'** and **'effective'**. In order for the plan to meet these tests it should provide a responsive and flexible supply of housing to maintain housing delivery in line with other parts of NPPF and enable land to be brought forward quickly.

Allocating additional land for development is consistent with the call to significantly boost housing delivery as required by paragraph 47 of NPPF and requirements for LPAs to ensure performance is within an acceptable range (20% of the planned supply). To account for this guidance the wording of the policy should be amended from 'Tring will deliver around 480 new homes' to **'Tring will deliver at least 480 new homes'**.

Whilst the Council's evidence base makes an assumption that windfalls will continue to deliver, in line with the calls in NPPF to provide a positive growth strategy and better respond to housing needs it is not considered that a reliance on windfalls is a sound basis for meeting the longer term development needs of the borough.

To add further flexibility and save placing reliance on one Greenfield option and windfall sites, we recommend the allocation of an alternative smaller option through the Site Allocations DPD at Station Road, Tring to assist in delivery should land at West Tring not be delivered or if further sites are required. This would be consistent with guidance in NPPF and the need for flexibility and this longer term view.

Our client owns a 1.5 hectare area of land located on Station Road, Tring (see Appendix 1). Land at Station Road, Tring represents an important opportunity to accommodate some of the Town's immediate development needs, as well as longer term growth aspirations. Development can be sensitively integrated with existing communities and the wider landscape setting. It would be compact, with a high quality public realm.

The key components of sustainable development at Station Road, Tring include:

- Housing - residential development of at least 50 dwellings (there is potential to increase the density on the developable area of the site above 30dph to deliver further development if required and subject to a detailed design). Development that can be phased, with the flexibility to meet immediate or longer term LDF requirements should other sites fail to deliver or if additional housing is required.
- Sustainability - a highly sustainable location, the site is well located being within walking distance to the railway station and Tring town centre. The location encourages transport by modes other than private car, something other development options may fail to achieve being located further from the station.
- Deliverability - within a single ownership allowing long term comprehensive planning and deliverability, wider opportunities and with land free of significant constraints.

- Strong landscape boundaries - an opportunity to strengthen and maintain the landscape framework to the east of the town.
- Access: Development can provide a safe means of vehicular and pedestrian access leading from either Station Road or Cow Lane.

Overall, there are no major constraints to prevent the site coming forward for development. It is available, suitable and achievable in relation to the NPPF criteria.

- **It is not justified in terms of consideration of realistic alternatives through a robust Green belt review.**

Paragraph 158 of NPPF requires that Local Plans are prepared on the basis of an *'adequate, up-to-date, and relevant evidence base about the economic, social and environmental characteristics and prospects of the area.'* Accordingly, given the extent of the Green Belt in the Borough a Green Belt review and assessment of the settlement boundaries should have been undertaken prior to submission of the Core Strategy to support the allocation of sites in the district, including those identified in the Tring Place Strategy (see our response to issue 2).

In order to be found sound the Core Strategy will need to be supported by a robust review of Green Belt boundaries. Paragraph 85 of NPPF also advises when reviewing boundaries, this should be based on existing boundaries which are clearly recognisable. Our client's site is roughly triangular in shape and has strong landscape boundaries to all sides. There is also a large block of woodland on the eastern site boundary which conceals the site. The strong landscape framework provides a strong and defensible boundary for the Green Belt. The release of this land would not undermine the purposes of the Green Belt.

In addition, NPPF Paragraph 84 advises that when drawing up or reviewing Green Belt boundaries that local planning authorities should also consider what impacts the revision of Green Belt boundaries would have on the promotion of sustainable patterns of travel. The site is well located on the eastern edge of the town being roughly equidistant to the town centre and the station (it is one of the closest development options to the Station).

- **The Tring Place Strategy needs to be based on a greater consideration of sustainable transport access.**

NPPF (paragraph 34) advises that *"plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised."* In addition, the general thrust of the NPPF (as outlined in paragraph 14) is aimed at contributing towards sustainable development through the planning system.

Therefore the place strategy for Tring could be more positive in promoting the use of sustainable transport by locating additional growth to the east of the town, near to Tring Station.

Our client's site is well located on the eastern edge of the town being roughly equidistant to the town centre and the station. It provides a highly sustainable location. Development in this location encourages transport by modes other than private car, something other development options may fail to achieve being located further from the station.

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

For the reasons set out to question 12.1 above, it is not clear whether site LA5 provides the most appropriate location for development for the following reasons:

- **Lack of Flexibility:** In line with calls in NPPF, to significantly boost housing delivery and provide greater flexibility, we recommend the allocation of an alternative smaller option(s) through the Site Allocations DPD. This would save placing reliance on one large site to deliver.
- **Lack of Green Belt Review:** due to the lack of a robust Green Belt Review, it is not considered that all reasonable alternative sites been fully assessed and therefore the Core Strategy is unsound and fails the tests of effective, justified and consistency with national policy. A Green Belt review and assessment of the settlement boundaries should have been undertaken prior to submission of the Core Strategy to support the allocation of sites, including those identified in the Tring Place Strategy.
- **Sustainable Transport:** NPPF (paragraph 34) advises that plans should give consideration to allocating land where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The 2011Pre-submission Core Strategy Sustainability Appraisal considered options to the East and West of the town and drew little distinction between the options in terms of landscape biodiversity and other issues. However, in line with the emphasis of NPPF, it is not considered that the availability of sustainable modes of transport has been given sufficient weight (see our response to question 12.1 above). Options to the east and west of the town appear roughly equidistant to the town centre. However options to the east of the town provide a highly sustainable location for development in terms of proximity to Tring Station.

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

The 2011Pre-submission Core Strategy seems to have given weight to the proposed allocation of the site at Icknield Way on the basis that it is one of the only development options outside of the AONB. However, the Sustainability Appraisal to support the Core Strategy (section 6.7.3, penultimate paragraph) advises that development on this Greenfield, Green Belt land within close proximity to the AONB would lead to adverse effects on landscape and townscape.

Paragraph 115 of NPPF states that “*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.*” However, paragraph 116 does not preclude development in such areas. It simply requires that attention is paid to the landscape and environmental issues. Therefore the Council should not preclude options in the AONB but should instead expect that consideration is given to “*any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*” The same considerations should apply to the site at Icknield Way which will impact upon the landscape and townscape when viewed from the AONB.

Although located within the AONB, our client’s land could be developed in a sensitive manner which respects the landscape setting. The topography of the land ensures that the site occupies a discreet location within the local landscape. Development could mirror adjacent development with existing housing to the north and south. The development would effectively ‘finish off’

development on the eastern side of the town and can be integrated into the existing settlement pattern without harming the quality and character of the area or the quality of the AONB. Given the nature of the site, development would not be highly visible. Limited views are available into the site and it is well concealed and screened by an established and dense hedgerow running along its boundaries and block of woodland to the east of the site. This remains effective all through the year and limits any views of the site from public vantage points. Overall, development on the site will have no detrimental impact to the amenity of the surrounding area or neighbouring properties. In addition a high quality landscaping scheme would help to further assimilate the site into the local landscape.

Summary to Issue 12

What part of the Core Strategy is unsound?

The Place Strategy for Tring is not considered to be sound.

Which test of soundness it fails?

It is considered that the Place Strategy for Tring fails the tests of justified, effective and consistency with national guidance.

Why it fails

- The place strategy for Tring is not sufficiently flexible or positive in line with guidance in NPPF. Insufficient land for development has been identified in the Core Strategy to meet housing needs and so more housing land will be required throughout the Borough, including the identification of more sites in Tring.
- The place strategy has not given sufficient weight to guidance in NPPF in locating development in proximity to public transport links.
- No robust assessment has been undertaken to assess whether the proposed locations for growth are the most appropriate in terms of the potential impact of the Green Belt. In the absence of a comprehensive review of the Green Belt, it is not considered that the proposed settlement strategy has been properly assessed or justified in terms of the requirements of NPPF (Section 9).

The precise change and/or wording sought

To save placing reliance on one Greenfield option and windfall sites, we recommend the provision is made in the Core Strategy for the allocation of an alternative smaller option(s) through the Site Allocations DPD. In doing so weight should be attached to the location of key services and sustainable transport links.

We recommend that paragraph 22.3 should be amended as follows:

Tring will deliver ~~around~~ **at least** 480 new homes. This includes approximately 150 homes through a local allocation on the western edge of the town, ~~together with affordable housing and new open space, including playing fields together with smaller allocations on the east of the town to be identified in the Site Allocations DPD.~~

The table below paragraph 22.9 should be amended accordingly.

WORD COUNT: 2,494

Appendix 1 – Land at Station Road, Tring



INDEX MAP PLAN



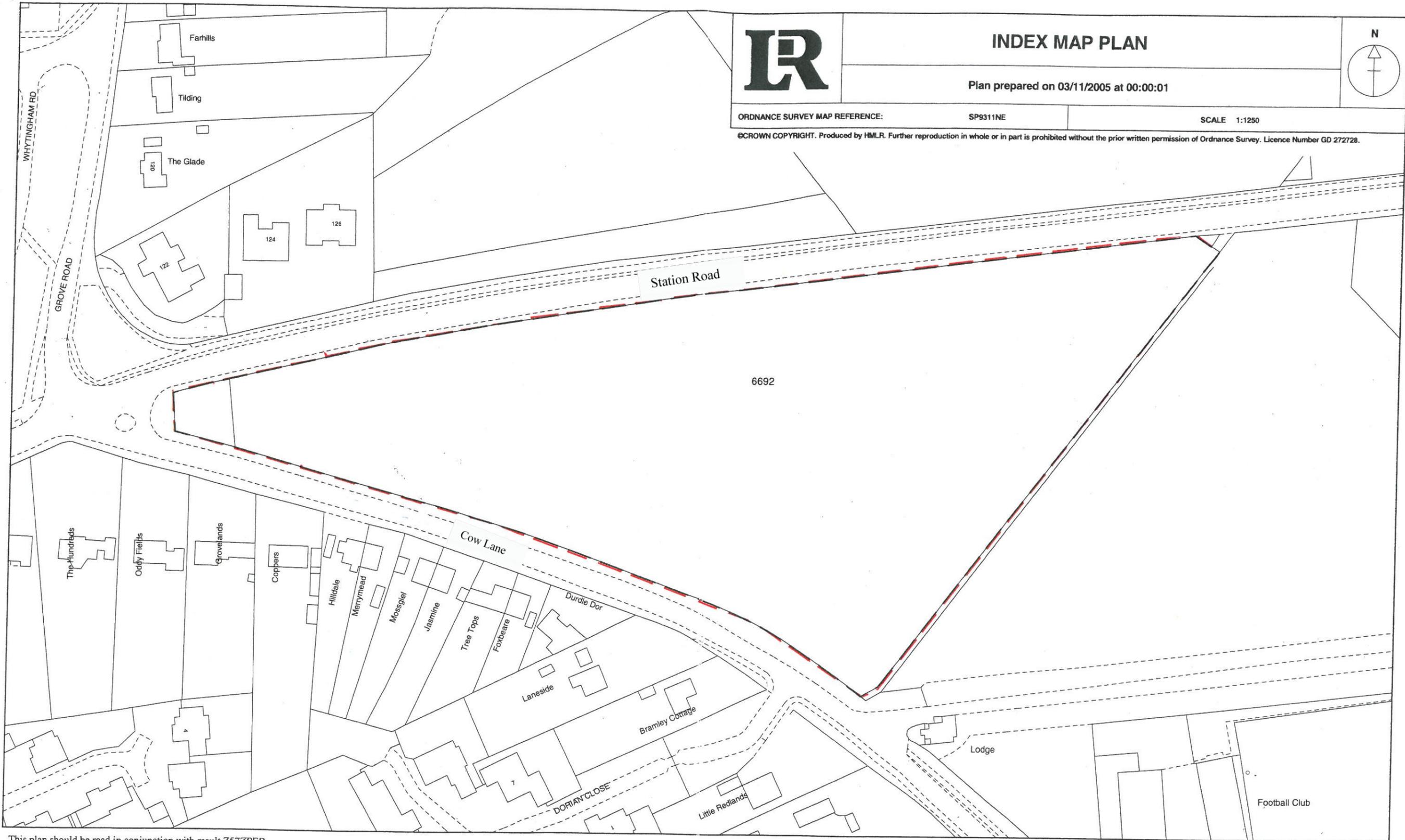
Plan prepared on 03/11/2005 at 00:00:01

ORDNANCE SURVEY MAP REFERENCE:

SP9311NE

SCALE 1:1250

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This plan should be read in conjunction with result Z57ZPEB



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