



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

Issue 14: Bovingdon

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

- 14.1 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?
- 14.2 Is the Chesham Road allocation (LA6) sound when assessed against reasonable alternatives?
- 14.3 Should there be a specific policy for the village as a whole in order to ensure that the Council's vision will be delivered?

Dacorum Borough Council's Response

14.1 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?

14.1.1 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 Bovingdon.

National guidance

14.1.2 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.

14.1.3 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 (ref paragraph 8, NPPF).

14.1.4 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)

14.1.5 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
- e) due consideration should be given to local community aspirations.

14.1.6 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.

14.1.7 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 2.1 in Issue Paper 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt).

14.1.8 Table 1 identifies Bovingdon as a large village. Large villages are ‘Areas of Limited Opportunity.’ It has an important role in meeting local housing needs, jobs and services, both for residents and adjoining rural communities. The general approach is to support development that enables the population to remain stable, unless a small element of growth is required to meet community needs. The broad approach to development set out within the Dacorum Borough Local Plan 1991-2011 (Evidence Document OT1) remains appropriate.

Local Considerations

14.1.9 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 NPPF (see above).

Technical studies

14.1.10 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.

14.1.11 The approach to homes and jobs within Bovingdon 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).

14.1.12 For Bovingdon, key recommendations are as follows:

Employment – Bovingdon’s employment area (Bovingdon Brickworks) is located within the Green Belt just outside of the village. It is recommended that this employment area is retained as it serves an important role in the overall employment market within the borough, as well as providing potential for local jobs. In addition, the brickworks produce important local building materials that support traditional building techniques. The prison, HMP The Mount, is also a major local employer. The Place Strategy seeks to safeguard both these employment uses.

Retail – The latest retail assessment does not contain any recommendations for local centres such as Bovingdon. The High Street provides for most of the residents’ day to day needs. There is an unimplemented permission for a ‘Tesco Local’ on the vacant garage site at the junction of the High Street and Chesham Road. A large market (c400 stalls) is held on the former Bovingdon airfield every Saturday and on bank holiday Mondays. It is appropriate that the current local shopping and service role of the village should be maintained. Developments that promote the vitality and vibrancy of the local centre should be encouraged and a minimum level of shop uses safeguarded. It is noted that current parking issues may have a direct impact on the access to retail services in the village. A long-term solution to this problem will continue to be discussed with Hertfordshire County Council. In the short-term, the focus will continue to be on traffic management and encouraging higher levels of trips by non-car modes.

Housing – The starting point has been to retain the village’s population at approximately its current base, and then considering what additional provision should be made. The Council has taken into account Bovingdon’s role in the settlement hierarchy, future urban capacity and the impact of development on the village’s character and function. Local objectives for housing have been set to reflect these conclusions and indicate an expected delivery of around 130 new homes (2006-2031). The need for outward expansion of the village has been considered and realistic options assessed through the ‘Assessment of Potential Local Allocations and Strategic Sites (Examination Document HG15). This considered the following locational options (and variations within them):

- Duckhall Farm
- Rear of Green Lane
- Grange Farm
- North of Chesham Road – east and west of Molyneaux Avenue
- Bovingdon airfield.

This assessment concluded that, on balance, the site north of Chesham Road, to

the east of Molyneaux Avenue, should be taken forward as the preferred option, due to the limited impact it would have on the openness on the wider Green Belt and the fact that it comprises a natural extension to the village. This local allocation (LA6) will provide around 60 of the expected new dwellings. Development at this site will include affordable housing and an area of public open space. A planning statement (Examination Document SG7) has been jointly prepared by the Council and the landowner, the Ministry of Justice, and will form the basis for a master plan. This master plan will be progressed as part of work on the Site Allocations DPD. Sites have also been tested through consultation on the Site Allocations DPD (Examination Documents SA1 and SA5). See also response to question 14.2 below.

Policy CS19: Affordable Housing sets a lower threshold for on-site delivery of affordable homes in the village than for 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 (Examination Document EN14). 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 Bovingdon 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 'village green' lies just outside of the village boundary.

Infrastructure - Through technical work (especially the Infrastructure Delivery Plan Update – Examination Document 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. No 'showstoppers' have been identified in relation to the level of growth planned for the village. The level of development proposed for the village in the Core Strategy is accepted by the County Council in terms of service issues. The Infrastructure Delivery Plan Update indicates that Bovingdon Primary School will be able to accommodate the level of development proposed through existing latent capacity. There is no secondary school within the village. Secondary schools in Hemel Hempstead have sufficient capacity to accommodate additional children. There is a doctors surgery within the village. This may need to expand, or make use of existing capacity at its sister-surgery in Kings Langley, or doctors surgeries in Hemel Hempstead where there is also capacity. There is a local desire for allotments to serve the village.

14.1.13 The recommendations of all this technical work has been taken into account when developing the Bovingdon Place Strategy – both in the formulation of the

vision, the setting of local objectives and the approach to growth and change.

Consultation

14.1.14 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)

14.1.15 This involved officers from the district and county councils, local councillors, residents and representatives from other organisations. A range of questions were asked relating to crime and anti-social behaviour, leisure and recreation, transportation, the environment, housing, employment, population, development options and design / character of the village.

14.1.16 The key issues identified were the condition of the High Street (congestion, lack of parking, and pedestrian environment), how to retain young people and ensure a good age mix within the village, and how to improve the secondary school accessibility. There was no consensus regarding how traffic and parking issues on the High Street should be resolved.

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

14.1.17 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. Feedback was requested on a dwelling level of 150 new homes. This level of growth would require a Green Belt release and feedback was sought on four options:

- Duckhall Farm;
- Rear of Green Lane;
- Grange Farm; and
- North of Chesham Road.

14.1.18 The majority of respondents agreed with the vision set out for the village. Issues raised with regard to the consultation questions included:

- The need for additional open space in the village;
- The need for Bovingdon to remain a village, with no large scale development proposed;
- Infrastructure must be able to cope with future levels of development; and
- Development should not expand into the Green Belt.

14.1.19 Most respondents, including Bovingdon Parish Council, considered that the level of planned growth was too high and there were generally low levels of support for the outward expansion of the village. However, land north of

Chesham Road was the preferred location on balance.

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

14.1.20 In this version of the plan, feedback was sought on the proposed Bovingdon Place Strategy. 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

14.1.21 Feedback was sought on two housing levels of 90 and 150 units. The higher figure would require a Green Belt release, with land north of Chesham Road put forward as the preferred option.

14.1.22 Responses to the Place Strategy were equally split between those who supported the general approach to the village and those who raised objections. Concerns raised through previous consultations were largely repeated, with landowners continuing to promote their sites as better alternatives. Bovingdon Parish Council supported the Place Strategy. They considered that the chosen local allocation was required to meet the long-term needs of the village and was preferable to other alternatives due to the limited impact this development would have on the Green Belt and the presence of natural, defensible boundaries. This support was however contingent on a number of requirements, including the delivery of 40% affordable housing and the provision of units suited to the elderly population.

(d) *Citizen's Panel*

14.1.23 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.

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

Sustainability Appraisal

14.1.25 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, with key conclusions as follows:

- Negative or uncertain effects are predicted for many of the environmental objectives, largely as a result of the inclusion of a greenfield housing site.
- Positive effects have been forecast against the majority of the social and

economic objectives. Delivery of the spatial strategy should make the village a more attractive place to live and work, by providing housing and maintaining the shopping and service role of the village centre. Safeguarding Bovingdon Brickworks and HMP The Mount will help to protect local employment opportunities.

Conclusions

14.1.26 Bovingdon is a relatively large village, with a population of about 4,600, set in gently undulating farmland in the south of the Borough. The village's urban structure, character and biodiversity are recognised in the Vision Diagram.

14.1.27 The scope for change within the village is limited – the trend is for small scale redevelopment and conversions to residential use. The key issue has been how far outwards the village should expand and how would this change the character of the village. The Council is reluctant to extend the village, but considers that a modest greenfield site will provide an important source of local homes. On balance, land north of Chesham Road (to the east of Molyneaux Avenue) is considered to be the best location for the future expansion of the village.

14.1.28 HMP the Mount and Bovingdon Brickworks provide important local job opportunities and support local shops and services.

14.1.29 The village is relatively compact, with a busy High Street. Local services and facilities should be protected and only a small change in retail development is anticipated.

14.1.30 Whilst congestion in the High Street is an issue at peak times, there is no broad consensus regarding the best (and most realistic) option for addressing this. Whilst a longer-term solution is discussed with the County Council, the short-term focus will be on traffic management and encouraging modal shift.

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

14.2 Is the Chesham Road allocation (LA6) sound when assessed against reasonable alternatives?

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

- i. Land at Duckhall Farm
- ii. Land rear of Green Lane
- iii. Grange Farm
- iv. Land north of Chesham Road (east and west of Molyneaux Avenue)
- v. Bovingdon airfield

14.2.2 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 sustainability, deliverability, impact on the wider Green Belt and ability to support the wider vision for Bovingdon. Sites have also been tested through consultation on the Site Allocations DPD (Examination Documents SA1 and SA5).

14.2.3 As the Assessment of Potential Local Allocations and Strategic Sites concludes, *"Options 1-4 are all considered suitable for development and there are advantages and disadvantages of each. On balance, it is recommended that the eastern section of Option 4 be the preferred local allocation. Development of the part of the land to the east of Molyneaux Avenue would not lead to the extension of the urban area boundary and would have a limited impact on the Green Belt"* (Page 190).

14.2.4 The choice of site best reflects feedback from local residents and other stakeholders (see Report of Consultation: Examination SUB6 and the summary of consultation feedback set out in response to question 14.1 above). Representations at the Pre-Submission stage against the proposal have been limited. Aside from those promoting alternative sites, or objecting to the loss of Green Belt in principle, issues raised can be addressed through careful planning and appropriate contributions towards local infrastructure. The principle of developing the site for housing has the support of the Parish Council, who opposed all other options that were put forward for consideration (see addendum to Examination Document SUB9).

14.2.5 The joint planning statement prepared by the Council and landowners, the Ministry of Justice (Examination Document SG7), demonstrates that the site is a realistic and deliverable option. It is not required for any future expansion of the prison and its development for housing will not have any impact on the operation of this facility. It has the ability to deliver new homes, including a high proportion (40%) of affordable units. It will also provide some additional open space within the village, enable local habitat improvements, create a soft edge with the countryside and ensure a defensible, long-term Green Belt boundary.

14.2.6 For the above reasons it is considered that LA6 is the most appropriate option for the village and should be retained as a local allocation within the Pre-Submission Core Strategy (Examination Document SUB1).

14.3 Should there be a specific policy for the village as a whole in order to ensure that the Council's vision will be delivered?

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

14.3.2 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 Bovingdon are brought together, and was considered beneficial to local communities in understanding how the planning framework relates to the village.

14.3.3 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.

14.3.4 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.