



Dacorum Borough Council
Core Strategy
Examination in Public

Issue 2: The Distribution of Development
(Settlement Hierarchy) and the Green Belt

Statement prepared on behalf of

The E.J Hillier Will Trust

and

Whiteacre Ltd

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by

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**Dacorum Borough Council Core Strategy Examination in Public
September/October 2012**

Issue 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt

1.0 Introduction

1.1 These representations are made by Hives Planning Ltd, in respect of land at Grange Farm, Bovingdon. Representations to previous stages of the Core Strategy have been submitted by Hives on behalf of the E.J. Hillier Will Trust, who are now promoting the site together with Whiteacre Ltd.

2.0 Issue 2.1

What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the sustainability appraisal support the chosen hierarchy?

2.1 Broad support is expressed for the principle of defining settlements within a hierarchy, and for providing for development in the more sustainable of the rural settlements (it would not be appropriate to simply direct all growth in the Borough to Hemel Hempstead, even were this possible).

2.2 Further, we have no objection to the Council's allocation of settlements within the various tiers (i.e. that Bovingdon is contained within the 'Large Villages' tier, along with Markyate and Kings Langley, and that these are appropriately identified as 'Areas of limited opportunity' for growth). However, the strategy is, currently, not sufficiently flexible in terms of the distribution of housing within the tiers of the settlement hierarchy – specifically, the 'Large Villages' tier – taking account of both the Sustainability Appraisal and other considerations. The distribution of housing within the Large Villages tier should be sufficiently flexible to recognise that Bovingdon i) is a highly sustainable settlement and ii) is a settlement which can suitably accommodate growth without detriment to national designations.

i) Sustainability

2.3 Bovingdon is a highly sustainable rural settlement, with an excellent range of local services and facilities (including doctors, dentist, a pharmacy, local convenience shop, post office, bank, places of worship, garage, etc) along with significant employment opportunities, e.g. at the Bovingdon Brickworks and HMP The Mount,

which are recognised as Major Developed Sites in the Green Belt. It also has good links by public transport to Hemel Hempstead, Chesham and Amersham from where there are wider connections to the national network via rail and underground services.

- 2.4 In relation to HMP The Mount, and since the draft Core Strategy was prepared and submitted for Examination, proposals for expansion of the Prison are currently being prepared (DBC ref 4/01010/12/PRE) and a planning application is expected imminently. The expansion of the Prison is proposed in order to accommodate a 31% increase in Category C prisoners (from 768 to 1008), and has been prepared within the context of a rising prison population in England and Wales which has resulted in 62% of prison establishments being officially overcrowded¹. The aim of the expansion is to allow more prisoners to be held around the London area, rather than more distant prisons, thereby enabling increased visitor contact.
- 2.5 The new expansion is expected to generate around 53 previously unforeseen new jobs in Bovingdon (see details of the proposals attached as Appendix A). The new jobs are expected to be filled by new, local staff which will drive an increase in the demand for housing in the village. This in turn will exacerbate problems of affordability and increase commuting unless a greater level of housing is allocated for the village.
- 2.6 A greater housing allocation in Bovingdon would perform better against the objectives of the Sustainability Appraisal (in particular to ensure that new housing is provided in sustainable locations, and which supports economic growth – e.g. Objectives 13, 15 and 18). Further, and unlike at Markyate and Kings Langley, there is the opportunity for appropriate development at Bovingdon to meet this higher allocation: as set out in our Statement to Issue 14, the identified site at Chesham Road (LA6) is not capable of delivering even the 60 dwellings that the Core Strategy currently envisages. A larger site is therefore needed even to accommodate the level of growth that the Core Strategy requires let alone to provide for the future growth in employment which will result from the expansion of HMP The Mount. To this end work undertaken on behalf of the E.J. Hillier Will Trust and Whiteacre Ltd indicates that up to 130 dwellings could be accommodated on the site at Grange Farm without significant environmental impact and without compromising the objectives of the Green Belt (see below). Therefore, when assessed against the environmental objectives of the Sustainability Appraisal, increasing the allocation of housing at Bovingdon performs well, in particular against the social and economic objectives because:

¹ Standard Note SN/SG/4334: Prison Population Statistics, May 2012

- Housing would be delivered in a location where employment opportunities are expected to grow;
- More affordable housing (for which there is an acute need across the Borough²) could be delivered;
- Greater benefits in terms of social infrastructure could be achieved (for example, allotments and open space, for which there is an acknowledged need, could be provided).

2.7 Overall, therefore, a greater housing allocation at Bovingdon (and a consequent reduction at Markyate and/or Kings Langley) would better contribute to the social, economic and environmental principles of sustainable development as set out in the NPPF and assessed in the Sustainability Appraisal.

ii) Suitability

2.8 As we have noted in our representations to previous stages of the Core Strategy, some settlements within the 'areas of limited opportunity' are more constrained than others – e.g. because they lie within areas designated as both AONB and Green Belt (e.g. Tring, Markyate). Further, the Core Strategy acknowledges that some settlements lack significant development opportunities (e.g. Markyate³). Whilst all of the settlements in the Large Villages lie within or adjacent to Green Belt, we have outlined in our Statement to Issue 14 how development at Grange Farm, Bovingdon could be provided without compromising the objectives of the Green Belt as set out at paragraph 80 of the NPPF. This is because the site does not contribute towards the separation of settlements; and because its development would not result in unrestricted sprawl of large urban areas, would not result in significant encroachment into the countryside (given that the site is well contained by Green Lane and Chesham Road); would not affect the setting of a historic town; and would not affect opportunities for urban regeneration (given the limited scope for brownfield re-development in the village).

2.9 Having regard to our submissions to Issue 6, we are of the view that the Core Strategy should provide for at least 13,500 dwellings over the plan period. Were this to be split proportionally in accordance with the current distribution (set out in Table 8 of the Core Strategy), this would result in a housing allocation for Bovingdon of around 155 dwellings. However having regard to the above, it is our submission that this should be increased to c.180-200 dwellings to reflect the sustainability of the

² Paragraphs 3.34 and 3.31, DBC Background Paper 'Selecting the Core Strategy Housing Target'

³ Core Strategy, paragraph 25.7

village, future employment growth (through the new plans for expansion of the prison) and the ability of the site at Grange Farm to appropriately accommodate development. Even if the total housing allocation for the Borough remains at 10,750 dwellings, the amount provided at Bovingdon should be increased and the amount provided at Markyate and/or Kings Langley, reduced in the corollary.

- 2.10 We would suggest that the figure for Markyate should most appropriately be reduced. This is firstly because some 110 dwellings are expected to come forward within Markyate as urban capacity, which is considered unrealistic given our analysis of the Urban Capacity Study in our Statement to Issue 14. Secondly, the current allocation of dwellings between the three settlements in the Large Villages is disproportionate in the extreme – see Table 1, below.

Table 1

Settlement	Current population	Current housing allocation in the Core Strategy	Increase in housing as a percentage of current population
Markyate	2,700	200	7.4%
Bovingdon	4,600	130	2.8%
Kings Langley	4,900	110	2.2%

- 2.11 Table 1 above makes it clear that the highest allocation of dwellings is proposed in the smallest settlement, while the lowest housing allocation is proposed in the largest settlement. This inverse proportionality is not explained or justified and is not considered appropriate. Instead, fewer dwellings should be proposed at Markyate and a greater number (180-200) proposed at Bovingdon.

3.0 Conclusions

- 3.1 Whilst we support the principle of providing a settlement hierarchy, and support the identification of Bovingdon within the 'Large Villages', we object to the distribution of housing within this tier. A higher level of development (in the region of 180-200 homes, taking account of an increase in the housing allocation for the Borough as a whole) should be allocated to Bovingdon and could appropriately be accommodated through a combination of urban capacity and a greenfield urban extension at Grange Farm. This approach would perform better under the Sustainability Appraisal objectives, would better meet local needs given the expected growth in employment opportunities, and would better accord with the economic, social and environmental sustainability objectives of the NPPF.

Appendix A:

*Minutes of Bovingdon Parish Council's Planning Committee, 23rd July 2012
Outlining proposals for expansion of HMP The Mount*

Bovingdon Parish Council

Planning Committee
held at
The Memorial Hall, High Street, Bovingdon
on 23 July 2012 starting at 6.15 p.m.

Present:

Councillor Richard Taylor (Chairman)
Councillor Kathy Banks
Councillor Tony Trigg

Representatives from the Village:

Five plus Councillor Julie Steer (Item 4)

1.	Apologies for absence	
	There were apologies for absence received from Councillor Povey who was working, Councillor Briden who was on holiday and from the Parish Clerk.	
2.	Declaration of Interests linked to any of the items	
	None.	
3.	Minutes of the meeting held on 2 July 2012	
	It was agreed by those present at this meeting that the minutes of the meeting held on 2 July 2012 were a true representation of the meeting and were signed by Councillor Trigg.	
4.	Representatives from the Ministry of Justice and The Mount Prison attended to discuss a planning application that is being prepared to improve and develop the existing facilities at The Mount.	
	See separate notes attached.	
5.	To consider the Parish Council's response to the following Planning Applications	
5.1	4/01012/12/FHA - 30B Chipperfield Road - Single storey side extension	
	No objection.	
5.2	4/01082/12/FHA - 47 Chipperfield Road - Demolition of existing double garage, store and utility area and construction of new single storey side and rear extension to provide single garage, utility and study (Amended Scheme)	
	Object - We objected to the earlier proposal because the new size was more than 130% of the 1948 size. We have no information on the size of the new application but if it is 130% or more we object.	
5.3	4/01123/12/FUL – Lot B1, rear of Wayside & High Firs and adj. to Upper Bourne End Lane – Single storey storage building	
	Support application.	
5.4	4/01098/12/FHA - 41 Pembridge Road - Loft Conversion.	
	Mr Bryant, 37 Pembridge Road, attended and objected on the	

	<p>grounds that he was now overlooked by what amounted to a three storey house and that the conversion had been done without permission. The applicant, Mr Morris, explained that he had checked with Dacorum Planning that it would be within Permitted Development and, therefore, did not need permission. As regards the original application, the owner of 39 Pembridge Road established that a conversion did not require permission and therefore the owner of 41 Pembridge Road assumed likewise. However, the owners of nos. 39 and 41 then decided to have a conversion that covered both properties and this does require permission. The Parish Council noted that a previous application for 41 to build a two storey extension had been rejected but a single storey extension was allowed with conditions. The council needs clarification that the conditions were not such as to disallow a subsequent loft conversion.</p>	
	<p>OBJECT - we are concerned that the earlier permission for the single storey development was specific (one storey only plus restrictions). We believe that there is a risk that this development will in effect be an attempt to circumvent the earlier restriction. We need further clarification. In the meantime we object to the proposal.</p>	
	<p>Post meeting note: The Planning Officer has subsequently confirmed that this matter will be referred to the Development Control Committee for a decision to be made.</p>	
5.5	4/01050/12/FHA – Green Fallow, Bury Rise – Side and front extensions	
	Support - subject to the extension not infringing the 130% rule for Green Belt developments.	
5.6	4/01181/12/FHA - St John House, Church Lane - Reclad and extend dormer window, garage conversion, replacement window and double doors.	
	Support - subject to the conservation area rules.	
5.7	4/01140/12/FHA - 15 Lancaster Drive - Demolition of existing garage and construction of new single storey extension to include replacement garage and single storey rear extension.	
	Support application.	
5.8	4/00199/12/FHA - 4 Boundary Cottages, Chipperfield Road - Demolition of rear store. Part two storey part single storey rear extension, amendment is reduction in size of first floor (Amended Scheme)	
	The applicant attended and said that Dacorum Planning were happy with the application and that it was only the Parish Council that had objected. Explained that BPC was bound to have regard to the 30% restriction. Although the proposed development had been revised it was still over 30% so BPC must object.	
5.9	4/01097/12/LBC - Water Lane Farm, Water Lane - Alterations and conversion of an existing barn to provide additional domestic accommodation to the existing house.	
	Support application.	

5.10	4/01277/12/FUL - Lot B8b Upper Bourne End Lane - Perimeter Fencing	
	Refer back to DBC to ascertain the proposed usage of the site.	
5.11	4/01145/12/DRC - The Bungalow, Venus Hill - Details of materials, hard and soft landscaping, slab levels, sustainability, contamination and remediation as required by conditions 2, 4, 6, 7, 10 and 11 of Planning Permission 4/11650/10/FUL (demolition of existing bungalow and construction of detached 5 bed dwelling)	
	The Parish Council are not qualified to give an opinion.	
6.	Planning Applications received at Dacorum Borough Council but not yet received in Parish	
6.1	4/01096/12/FHA - Water Lane Farm, Water Lane - Alterations and conversion of an attached barn to provide additional domestic accommodation to the existing house.	
7.	To note the outcome of Planning Applications considered by Dacorum Borough Council:-	
7.1	4/00107/12/FUL - Zeera, 49 High Street - Alterations to front windows and access. Two storey rear extension to replace existing single story extension. Internal alterations and repositioning of rear kitchen extract. New boundary wall and fence - GRANTED.	
7.2	4/00792/12/LBC - The White Cottage, 58 Chipperfield Road - First floor side and single storey rear extension. Reinforcement of the grassed crossover with golpla (Amended Scheme) - GRANTED	
7.3	4/00905/12/FHA - 72 High Street - Demolition of conservatory and construction of first floor rear extension - GRANTED.	
7.4	Land at the Yard (Bldg 2) Shantock Hall Lane - General purpose farm building (Amended Scheme) - GRANTED UNDER PERMITTED DEVELOPMENT.	
8.	To note dates for Appeals / Forthcoming Inquiries / Forthcoming Hearings - all previously reported to the Planning Committee:	
8.1	Appeals Lodged:	
	None.	
8.2	Appeals Dismissed:	
	None.	
8.3	Appeals Allowed	
	None.	
9.	Date of next meeting	
	Monday 13 August 2012 at 6.30 p.m. in The Memorial Hall	All to note
	Meeting closed at 9.00 p.m.	

Item 4 – HMP The Mount

The Prison will remain a Category C prison.

Number of prisoners will increase from 768 to 1008. The level of staff will increase from 340 full time staff and 70 contract workers. There will be an additional 53 full time staff posts.

To accommodate the new prisoners there will be a new housing block built within the existing footprint.

There will be three new buildings:

1 x Housing Block (3 Storey)

1 x New kitchen block (1 Storey)

1 x Facility for Sports (1 Storey)

The old kitchen will be reused as 6 classrooms and a mental health wellness unit and there will be a reinforced health care provision and storage.

30 Additional parking spaces will be provided.

A flood risk assessment has been carried out and a pre planning application submitted to Dacorum Borough Council. An ecological survey has been carried out and no trees will be affected. A Landscape assessment and plan has also been conducted.

All Ministry of Justice (MoJ) buildings are “green excellence rated” (Low carbon/carbon neutral)

To cope with the expansion there will be two extra visiting sessions (most likely on a Wednesday and Thursday).

Plan is for an August 2014 opening – start building in a year.

Public Questions

Q. Will there be standard Category C prisoners i.e. no sex offenders unit?

A. Only Cat C standard prisoners.

Q. Parking is a problem on Lancaster already with extra staff and visiting 30 extra parking spaces will not be enough, can the MoJ look at this?

A. Yes – a depth of feeling on this issue is noted.

Q. How many prisoners have escaped? Can you release escape statistics?

A. Yes “there haven’t been any escapees.

Q. Have noise levels been taken in to account.

A. This should not be a concern we do not house young offenders anymore and the new block is at the back of the site.

Q. Are you aware that the bus route to the Prison only runs each hour and is unreliable?

A. We will look at this when developing the green travel plan.

Q. If development is starting in a year are you aware that this may clash with the Tesco development and cause major issues with traffic on the same road.

A. We will look at that and we must put a plan in place.

The MoJ summed up by saying they want an incentivised Green travel plan and this they hoped would alleviate some parking issues. The members of the public in attendance had serious reservations about this and Mr Paul Breeze (07595 754002) offered to assist the MoJ in looking at the parking issues.

The MoJ indicated that the Parish Council should have the planning application in the next 10 – 12 weeks.