

# **Non Participant Statement: Issue 3**

## **Accessibility**

### **Grand Union Investments and Dacorum Borough Council**

*September 2012*

## Issue 3: Accessibility

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**Question 3.2: Have transport needs been properly identified and have those needs been adequately addressed? Is the reliance on forthcoming Transport Plans appropriate?**

- 1) The comments below seek largely to review information and evidence produced since the representation submitted on the pre-submission Core Strategy (CS) in December 2011.
- 2) Draft Core Strategy Policy CS8 is not considered to be effective as it is not sufficiently flexible. The policy states that development proposals will contribute to the implementation of the strategies and priorities set out in the Local Transport Plan and local Urban Transport Plans. However, settlement-specific local Urban Transport Plans have not yet been published.
- 3) It is the responsibility of the Core Strategy to identify new transport infrastructure improvements at each settlement in order to produce a positively prepared plan in accordance with the NPPF (157 and 182).
- 4) The CS is also contrary to NPPF which identifies the need to develop strategies for the provision of viable infrastructure necessary to support sustainable development. NPPF (41) states that authorities should identify and protect, where there is robust evidence, sites which could be critical in developing infrastructure to widen transport choice. NPPF (35) states that Plans should exploit opportunities for the use of sustainable transport modes.
- 5) In the absence of a Berkhamsted - specific Transport Plan, there is no robust evidence to inform the infrastructure required to support the town's growth or identification of the sites with the critical mass to assist in the delivery of strategic transport improvements.
- 6) Land South of Berkhamsted proposes the implementation of a bus loop for the town which would offset the impact of additional trips resulting from the proposed development by reducing the reliance on private car use, and provide better access to the town centre for the elderly, those with reduced mobility and those who do not drive. Alternatively, GUI has also consulted with HCC (the Head of the Transport department and his team) about upgrading existing bus services as part of an enhanced public transport package (notes of this meeting are appended to our Participant Statement for Issue 11). The proposals also include a new East-West Avenue between Chesham Road and Swing Gate Lane which would help the overall movement of vehicles in the town.

- 7) The effect of funding such significant improvements in public transport accessibility and smarter travel measures is assumed to result in a shift of 10% towards the use of more sustainable modes by new residents compared to existing. This equates to a 13% reduction in the total number of car-borne trips, and a 39% increase in the number of trips made by sustainable modes than would otherwise be expected. Savills' HIDE submitted as part of GUI's representations submitted in response to DBC's Pre-Submission CS demonstrates that these carefully planned transportation improvements are viable and deliverable.
- 8) Land South of Berkhamsted therefore represents a unique opportunity to widen transport choice, and encourage the use of sustainable transport modes in accordance with the NPPF.

**Question 3.4: What are the small-scale improvements referred to in paragraph 4 of policy CS9?**

- 1) Draft Policy CS9 is not considered justified or effective because it identifies that only "small-scale" improvement will be undertaken to tackle "local" problems. "Small-scale" is not defined and the reasoning for this limitation is not clear. Local new road improvements could be required to address strategic, settlement-specific issues which might not necessarily be considered "small-scale." The policy also fails to recognise the role new development can have to facilitate new transportation (road related and otherwise) improvements.
- 2) As identified above in the response to Question 3.2, such an approach is not considered to comply with the NPPF.
- 3) The CS Plan transport policies are found:
  - Not positively prepared
  - Not effective
  - Unjustified
  - Not consistent with the NPPF