

Dacorum Borough Council Core Strategy Examination: October 2012

Statement from CPRE Hertfordshire (Representor Id: 498429)

Issue 12: Tring, Question 12.2

1. I, Elizabeth Hamilton, represent CPRE Hertfordshire (CPRE)
2. CPRE wishes to make representations in respect of the proposal for allocated site LA5, mainly covered under Question 12.2 but also relevant to Question 12.1, 12.4 and 12.5.
3. This statement complements our original representations on the Core Strategy Pre-submission, which are still relevant, and seeks to address the Inspector's relevant questions as set out in his guidance note.

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?

4. CPRE has already expressed the view that the Core Strategy is unsound in respect of LA5 because the proposal involves development in the Green Belt which is not consistent with national policy on the Green Belt. We have also said that the site is probably the most unsustainable in Tring for housing development, being furthest away from the railway station and likely to encourage private car use. In these respects it is contrary to a number of stated objectives of the pre-submission Core Strategy.
5. CPRE supported the lower figure of 9,835 dwellings set out as Option I in the Draft Core Strategy which would not require the release of LA5 from the Green Belt.
6. The choice of the Draft Core Strategy Option Two housing target in the pre-submission Core Strategy, requiring 150 homes to be built in the Green Belt at LA5, is not in CPRE's view consistent with the proposed settlement hierarchy which includes Tring as an area of limited opportunity and Hemel Hempstead as the location to concentrate development. The Sustainable Development Strategy states that development 'to enable the population to remain stable' should be the general approach in Tring, 'unless a small element of growth is required to support local community needs'. In CPRE's view such evidence for such needs in Tring has not been provided by Dacorum Council.

7. The use of Green Belt land, and in particular a site likely to promote private car use, is not in conformity with a number of the Challenges set out in the Pre-submission Core Strategy, including managing travel demand to ease congestion and pollution. Neither is it in conformity with a number of the Strategic Objectives.
8. The Sustainability Appraisal confirms CPRE's view that housing development in this location, being 2 km away from the main town centre, would lead to increased car use to access town centre services. To this we would add increased car use to access the secondary school, railway station (which is over 4km distant) and the town's main supermarket. All this would lead to a growth in greenhouse gas emissions and air pollution. The Appraisal also notes that the proximity of the site to the A41 would result a level of noise disturbance which could affect health and well-being of the residents.
9. The boundary of the Chilterns Area of Outstanding Natural Beauty (AONB) crosses the triangle of land bordered by the B488 and B4635 roads beyond the western edge of Tring, which is the site indicated as the location of LA5. Our view is that development of any part of the land beyond the western edge of the existing settlement would not be in conformity with paragraph 115 of the NPPF.
10. The proposals for LA5 are not in conformity with the pre-submission Core Strategy in respect of Policy CS24, in particular that development will have regard to the policies set out in the Chilterns Conservation Board's Management Plan, in particular Policy L5: Ensure the impact of development adjacent to the AONB is sympathetic to the character of the Chilterns and maintains the quality of views from it and of it.
11. In CPRE's opinion views to the site LA5 and from it would be impacted by development beyond the existing settlement edge, in particular views on foot from the footpaths crossing the land to the west of the present settlement edge, and views across the site from footpaths within the AONB on higher land to the south. This point is illustrated in the photographs in Appendix A which includes an aerial photograph containing a key to where each photograph was taken from and the direction the camera was pointing.
12. The footpath leaving the western edge of the existing settlement running north-west towards Beeches Farm across Green Belt land offers an immediate rural feel and excellent views of the AONB, especially the wooded higher land to the south (see Appendix A photograph 1). The same applies to the footpath running north-south across this triangle of land which is alongside the AONB boundary. Appendix A photograph 2

shows the view from this footpath across the Green Belt land towards the cemetery and the higher AONB land beyond. Both these paths offer opportunities for enjoying green space in close proximity to the urban areas of Tring which would be severely impaired if the land which they cross or adjoin were to be developed.

13. The north-south footpath is also significant in providing a link between land within the AONB to the south and to the north which does not pass through the built-up area of Tring. The tall hedge bordering the eastern side of this footpath maintains a rural feel which would be lost if the land immediately to the east was developed. The fields immediately to the west of the settlement edge currently provide a buffer between the AONB and the urban edge, fulfilling one of the functions of the Green Belt to maintain openness: this would be lost if these fields were wholly or partly developed.
14. The LA5 site is especially visible from within the AONB on the footpath on the steeply rising land to the south-west of Dancers End Lane, as shown in Appendix A photograph 3. Development on the site would further impact on the otherwise fine views from here of the Chalk scarp within the AONB to the north.
15. CPRE suggests that playing fields would be better located in a less isolated position within the town, capable of utilising existing built facilities. Were playing fields to be located at the western end of the triangle of land beyond the LA5 site, they would be within the AONB, and impact on its current rural feel and views from the urban edge and the public footpaths to the AONB beyond (see Appendix A photograph 4). Associated parking on this site would also impact on the AONB.

Summary

16. The inclusion of LA5 renders the Core Strategy unsound.
17. It fails three of the four soundness criteria, namely:
 - Would not be effective because it would not achieve the stated intentions of the Core Strategy.
 - Is not justified because the exceptional circumstances required to allow the inclusion of LA5 have not been demonstrated, and it is not the most appropriate strategy when

considered against the reasonable alternatives, which include adopting the lower (Option 1) housing target proposed the Draft Core Strategy.

- Is not consistent with national policy because the inclusion of LA5 does not enable the delivery of sustainable development in accordance with the policies in the NPPF. Specifically the inclusion of LA5 contravenes Green Belt policies in paragraphs 79, 80, 81, 83 and 87 of the NPPF, and paragraph 115 of the NPPF relating to AONBs.

18. In respect of this issue the Core Strategy can be made sound by deleting all reference to LA5.

Appendix A: CONTENTS

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6	Photograph 1: See paragraph 12: view south east across Green Belt land and the site of LA5 towards the present edge of settlement in Tring, from approx GR910115 on the public footpath running from the edge of Tring north west to Beeches Farm.
7	Photograph 2: See paragraph 12: view south east across Green Belt land towards Tring Cemetery and the wooded higher land in the Chilterns AONB, from GR910113 on the public footpath running north- south along the AONB boundary.
8	Photograph 3: See paragraph 14: view from the public footpath running along the northern edge of Buckland Hoo woodland at approx GR902103 within the Chilterns AONB looking north east towards the LA5 site.
9	Photograph 4: See paragraph 15: view from the public footpath at GR909114 looking approx south west across immediately adjacent land in the AONB towards higher wooded land in the AONB beyond the A41.
10	Google Map showing photograph location points

Photograph 1



Photograph 2



Photograph 3



Photograph 4





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