



**Canal &
River Trust**

Keeping people, nature & history connected

14 September 2012

Mr P Plato
Plato Estates
PO Box 745,
Chesham,
Buckinghamshire
HP5 3XT

Our Ref JH/O/LDF/2012-3/Dacorum
Your Ref

RE Dacorum Moorings Policy

Dear Mr Plato

Thank you for drawing to our attention that Paragraph 26.11 of the Dacorum Pre-submission Core Strategy states, in its final sentence, that 'a number of boating facilities are available in the area and additional mooring basins will not be supported'. We comment that the Grand Union Canal runs for 17 miles through the Dacorum district and is one of the most well used canals in the country. Much of the Dacorum district and therefore the Canal is covered either by Green Belt or the Chilterns Area of Outstanding Natural Beauty. The plan vision seeks that 'special features, such as the Grand Union Canal, remain an active part of the heritage of the borough'.

The Trust believes that the statement 'a number of boating facilities are available in the area and additional mooring basins will not be supported' in paragraph 26.11 is unsound as it is not justified. To be justified the National Planning Policy Framework advises that 'the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence'.

The Council have set out their strategy via the settlement hierarchy. The Council propose that the countryside is an area of development restraint as this is one of the least sustainable areas of the borough, where significant environmental constraints apply. In the plan the Council set out policies on how it intends to deliver this strategy. The Council however does not appear to have produced any evidence to justify why it is necessary to adopt the stance set out in paragraph 26.11 in relation to additional mooring basins when considered against reasonable alternatives. One reasonable alternative would be to judge such proposals against the restraint policies proposed in the plan and where relevant the policies in the National Planning Policy Framework relating to green belt and areas of outstanding natural beauty. It should be noted that the location of waterways are fixed i.e. they are non-footloose. The location of offline mooring development is therefore dependent on a connection to a non-footloose asset and a number of other factors such as topography and land values can impact on the location of offline moorings. Locations within or adjoining settlements may not be available.

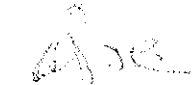
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Furthermore one of the Trusts strategic aims for long terms moorings is to facilitate growth in the supply of offline moorings to meet increases in demand and to reduce pressure for mooring along the line of the waterway. The proposal to reject mooring basins proposals as a form of providing mooring berths would be in direct conflict with Trusts strategic aims for long term moorings. We advise that the Trust no longer directly seeks to answer questions regarding the justification for new moorings but we do provide information to developers so they can build their own case.

We therefore comment that there appears to be an absence of evidence to justify the stance taken in paragraph 26.11 as opposed to one reasonable alternative of judging such proposals against the restraint policies proposed in the plan and the policies in national guidance relating to green belt and areas of outstanding natural beauty. The Canal & River Trust suggest that the issue of soundness could be addressed by deleting the final sentence of paragraph 26.11.

Yours sincerely



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