

**Submission to Planning Inspector by West Hemel
Action Group [WHAG]**

**Examination of the Dacorum Site Allocations
Development Plan document – October 2016**

Dacorum Site Allocations DPD

Matters, Issues and Questions

Matter 9 Policy LA3: West Hemel Hempstead

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- 1 Is the policy wording in relation to the submission of an outline planning application sufficiently flexible?

No comment from WHAG.

- 2 **Should the policy reflect the developer of the site will only be required to carry out upgrading of the drainage infrastructure directly related to the site?**

- 1 WHAG consider that any potential developer should be required to do more than just upgrading of site specific drainage infrastructure.
- 2 The existing site already suffers from poor drainage as demonstrated by regular flooding on the existing land and surrounding areas (see picture and link to video below of recent flooding in lower end of LA3 and adjacent Winkwell area).

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Figure 1 View of field in SE corner of LA3, looking west – March 2016

Link to Video on WHAG facebook page, showing flooding along Chaulden Lane – March 2016:

<https://www.facebook.com/316081781856132/videos/768375386626767/>

- 3 The proposed addition of 900 properties to LA3 will inevitably add strain to the existing drainage infrastructure in an area that is already prone to flooding. With additional development on LA3 the water that currently does drain through the land, would no longer be able to do so as a result of hard landscaping.
- 4 The above applies to rainwater drainage but the same principles apply to all forms of drainage, where historically there have been a number of problems.
- 5 As a result, there will need to be significant upgrades to the existing surrounding drainage infrastructure (rainwater and sewage) to accommodate these additional drainage demands, as well as the site specific drainage.

Please see further supporting information in Appendix 9.1 below.

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3 Has full consideration been given to the increase in traffic associated with the development and the pressure on existing schools and healthcare facilities?

- 1 We do not believe the allocations, and specifically LA3, are based on a robust assessment of infrastructure requirements for the reasons below, covering the following areas:
- Transport and roads
 - Health, hospitals and emergency services
 - Education

Transport and roads:

- 2 DBC commissioned a Transport Study in July 2015 by the consultants, Jacobs (*Hemel Hempstead transport model update – 2031 scenario testing - Ref. ver 4 dated 10th July 2015*). This stated that ... "in full traffic demand conditions in the AM period traffic levels [in their model] grow relatively quickly to form queues at key locations... congestion builds from 08.00 to 08.15. Following this point the network reaches gridlock... In the PM period, traffic levels increase more gradually than in the am period... at 16.30 queues have started to form but... still running smoothly... [Once the model] reached 17.00... the queues have become much more severe. Following this point the network reaches gridlock... *The current road network would be unable to cope with the full level of proposed development.*" [Italics – WHAG]
- 3 The Core Strategy 'resolves' this gridlock by assuming an arbitrary 15% reduction in traffic flows without demonstrating
- (1) that the underlying model data is sound;
(2) how this 15% reduction in traffic is achieved; or
(3) what the probability and impact is of the risk that gridlock will occur under this assumption.
- 4 LA3 is a large swathe of land on the western boundary of Hemel Hempstead. The location of the site means that the vast majority of traffic, which we estimate could be in the region of 1500-2000 vehicle journeys per day, will be heading from west to east towards central Hemel Hempstead, on roads which are already nearing capacity. The only planned access points are to the eastern boundary of the LA3 site as it is not practical to build any to the North, South or West. This is illustrated in the diagram below.

Submission to Planning Inspector by West Hemel Action Group [WHAG] Examination of the Dacorum Site Allocations Development Plan document – October 2016

Matter 9 Policy LA3: West Hemel Hempstead

- 5 Though the desire to promote non-car modes of transport is laudable the reality of the location and realistic public transport support are such that the new estate will be largely dependent on private car access to facilities of the town and more widely for travel to work and social activities. The context does not properly reflect the likely impact of the additional car use from the estate.

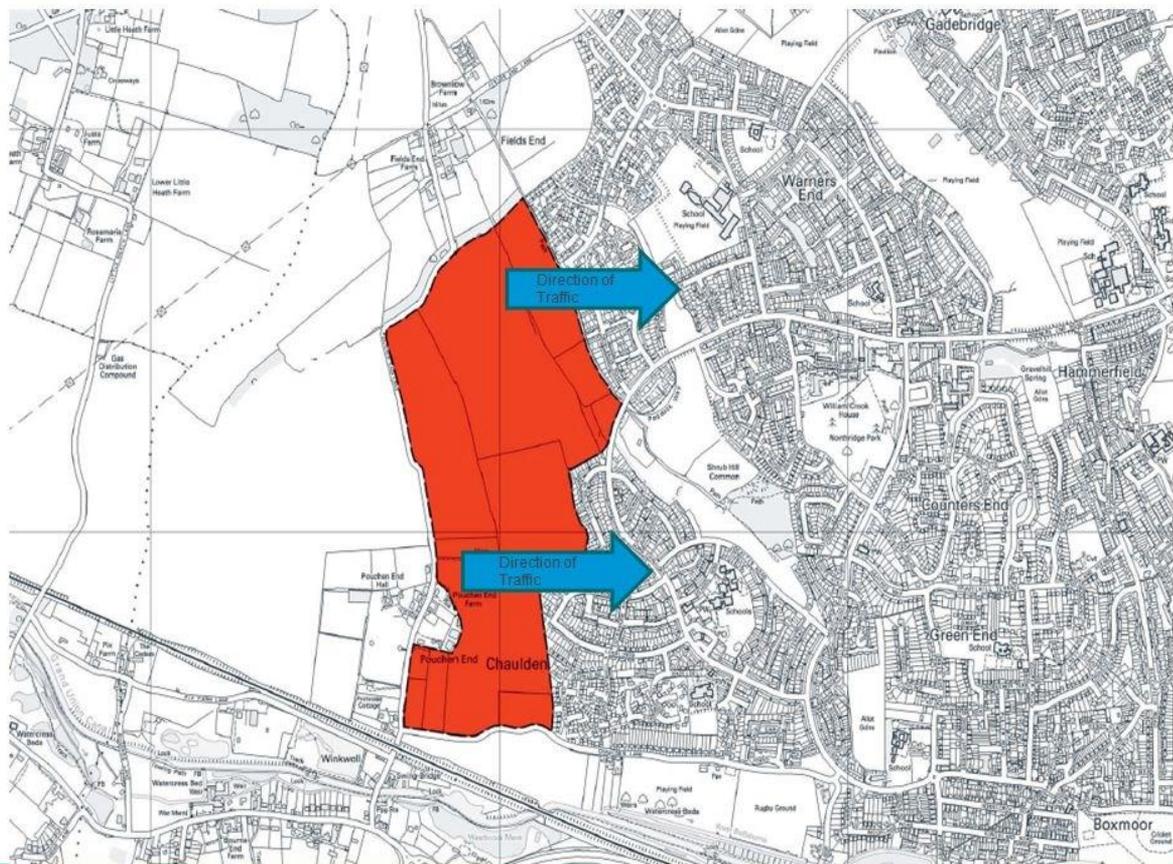


Figure 2 Map showing direction of travel of the majority of traffic from LA3

- 6 Local arterial roads A41 and A4251 and other key local routes are already clogged, resulting in stationary traffic in rush hours. The larger natural traffic flows are towards M25/London via A41/A4251 or eastwards to Maylands Industrial area, this being the largest area for employment in Hemel Hempstead. The incremental and cumulative impact of the proposed development is severe and no effective mitigation proposals have been published.

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Matter 9 Policy LA3: West Hemel Hempstead

- 7 Emergency services would be unable to penetrate as far as LA3 or indeed much of Hemel Hempstead during either morning or evening rush hours, based on the above Jacobs report.
- 8 In addition, the proposed LA3 development, and specifically the current proposed location of the travellers' site down Chaulden Lane (along the southern boundary of LA3), would result in this already busy and dangerous road, used as a "rat run" to the A41 and from there to the M25, becoming busier and more dangerous. This road, in places, is single lane with passing places outside the 30 mph zone, while within that zone it is often reduced to single lane by the cars parked alongside the regularly-used playing fields. This will further restrict emergency access, over and above those regularly reported at present.
- 9 In conclusion, the fact that DBC are not considering any additional road infrastructure to cope with the extra traffic means that LA3 fails in this respect alone of being a viable site for development.

Health, Hospital and Emergency Services:

Hospitals, emergency services

- 10 There has not been a full service hospital in Hemel Hempstead for a number of years. The Care Quality Commission inspection in September 2015 said:

"[it] requires improvement with one of the five key questions which we always rate being inadequate (well led). Two services – urgent care centre and outpatients – were rated as requires improvement."

- 11 The nearest A & E Unit is at Watford General Hospital, which is nearly 10 miles and a minimum 25 minutes from the Hemel hospital in normal conditions. The local MP, Rt Hon Mike Penning, has made regular representations about the inadequacy of healthcare in Dacorum.
- 12 To build this number of properties with the current insufficient medical facilities could only be considered irresponsible.

Doctors' surgeries

- 13 Doctors' surgeries in west Hemel Hempstead are currently overloaded. It has not been clarified whether a new surgery would be included in LA3, or merely an expansion of the already overloaded Parkwood Drive Surgery

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Matter 9 Policy LA3: West Hemel Hempstead

which is rated only 12th out of 17 in the feedback held for Dacorum on the NHS Choices website.

- 14 Even if the decision was to expand Parkwood Drive, it is questionable as to how this can be achieved. It is noted that even a written representation by one of those supporting the LA3 development (Comment ID 1658) remarks that parking is already a problem at the existing Parkwood Drive Surgery.

Education:

- 15 Education is also the responsibility of Herts CC, rather than Dacorum BC. However as with transport, the two authorities have to work together to ensure that there are sufficient school places available.
- 16 The Core Strategy indicates that a primary school is planned for LA3 but there are no plans for a secondary school.
- 17 The table below is taken from Herts CC education planning document and covers the period to 2026/27. The plan for LA3 envisages that houses will be built from 2021 to 2031. The plan below does not, therefore, appear to take any account of the people moving into LA3 who have children of secondary school age and will therefore be needing additional places; indeed the numbers start to fall towards the second half of the period covered. By Herts' own estimates, there is already up to 10.3% shortfall (2022/23) in the numbers before these additional children are taken into

2016/17 SUMMER FORECAST - SECONDARY

19 HEMEL HEMPSTEAD			ACTUALS				FORECAST									
NO	SCHOOL	School admissions 2016	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
	Number of Year 7 places available	1,310	1,048	1,073	1310	1310	1310	1310	1310	1310	1310	1310	1310	1310	1310	
	Demand				1121	1166	1252	1324	1351	1375	1445	1424	1382	1393	1383	
	Surplus/Shortage				189	144	58	-14	-41	-65	-135	-114	-72	-83	-73	
	% Surplus/Shortage				14.4%	11.0%	4.4%	-1.1%	-3.1%	-5.0%	-10.3%	-8.7%	-5.5%	-6.3%	-5.6%	
	No of FE				6.3	4.8	1.9	-0.5	-1.4	-2.2	-4.5	-3.8	-2.4	-2.8	-2.4	

account.

Source: Hertsdirect.org –Secondary forecast 2016-7

<http://www.hertfordshire.gov.uk/services/edlearn/aboutstatesch/planning/>

- 18 In summary, there will be a net increase in family accommodation as a result of the Core Strategy/Local Allocations of 10,000+ homes including the 900 in LA3. The above school number planning does not take into account this increase, thereby raising the question of where the children of the LA3 population will be educated after 11. This further questions the viability of LA3.

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October 2016**

Matter 9 Policy LA3: West Hemel Hempstead

Conclusion

- 19 Based on the above, WHAG do not believe that full consideration has been given to the increase in traffic and the impact on health and education as a result of the new allocations, and specifically LA3.

4 Should the site come forward prior to 2021 if it is available?

Given the number of issues that WHAG consider are associated with LA3, we do not consider that any plans to bring the development forward have any merit.

- 5 Is a reference needed in the policy to ecology and the link to Shrub Hill Common Local Nature Reserve?

WHAG have no comment on this section.

6 Is the site viable with the provision of a traveller site?

WHAG have no comments to make about the specific viability. However, we would refer you to our previous comments to "Matters 3 – Gypsies and Travellers".

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Matter 9 Policy LA3: West Hemel Hempstead

Appendix 9.1

Drainage Basins

About 30% of the area of LA3 (catchments 1 and 2 in the plan) drains into the western branch of the dry valley that forms Shrubhill Common. There is currently a small drainage ditch in this area which leads to a drainage depression just to the north of the common. Throughflow and groundwater flow through the valley eventually feeds into the River Bulbourne near Hemel Hempstead Rugby Club. There is a history of flash flooding towards the lower end of the valley affecting households during heavy rainstorms. The remaining area of LA3 (catchments 3, 4 and 5) drains south, on moderate slopes, towards the Bulbourne Valley. Here water emerges from the underlying chalk to feed springs in the river bed. During periods of prolonged rain or heavy storms some overland flow may occur with temporary ponds forming on the saturated soils towards the valley bottom.

Hydrology and the Impact of Urbanisation

Most of the area of the proposed development is currently arable land with some hedges and trees. The soil has developed on clay with flints and other related deposits which overlay the cretaceous chalk rocks. On the higher less steep areas the clay layer is several metres thick but thins considerably on the steeper slopes. Whilst the soils can become quite wet, rainfall generally infiltrates into the soil and percolates down into the chalk. Through flow, interflow and groundwater flow takes the water slowly towards the valley bottom. The construction of a new neighbourhood will involve the building of roads, paths, driveways and roof areas, which will lead to a large increase in the amount of impermeable surfaces. The surface runoff from this area will largely enter a manmade drainage system, thus reducing the natural movement of water towards and into the River Bulbourne. This river is a rare chalk stream which has already been recognised by the Environment Agency, Hertfordshire County Council and Dacorum Borough Council as being at risk from low flows, caused by over-abstraction of water from the chalk being used for domestic water supply. There are also water quality issues to be addressed to prevent pollutants and sediments from the developed area entering the river.

Tackling Water Issues - Water Conservation

Water entering the manmade drainage system should be retained within the catchment by installing water butts in all gardens, creating new local water infiltration areas in conjunction with natural zones to increase biodiversity and making good use of the existing drainage depression above Shrubhill Common. Water re-entering the River Bulbourne must pass through sediment and

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October 2016**

Matter 9 Policy LA3: West Hemel Hempstead

pollution traps. A local water treatment plant for both road runoff and sewage should be constructed so that water can be returned to the Bulbourne/Gade system locally, rather than be taken many miles away to Maple Cross for processing, before entering the River Colne. The construction of impermeable surfaces across LA3 should be minimised and development in catchment areas 1 and 2, above Shrubhill Common, should be restricted, so as to maintain existing levels of groundwater flow into the common. The use of grey water by all households should be an essential part of building design in LA3. It is essential, that if the development goes ahead, DBC keeps rigidly to the environmental principles established in its own Core Strategy document.

Source: Stephen Wilson, Vice Chair of DEF

End of document