

Nettleden with Potten End Parish Council

Comments on the Dacorum Local Plan 2024 – 2040

Revised Strategy for Growth

Response to Dacorum Borough Council's Regulation 18 Consultation,

Agreed in principle by the Parish Council at its meeting on 16th November 2023 and in more detail at an informal meeting on 6th December 2023

The online consultation is split into six sections

1. Where does the response relate to?
2. To what extent do you agree or disagree with the proposed changes to the strategy?
3. When thinking about the future what are the five most important things to you?
4. What evidence would you like to comment on?
5. How did you hear about this consultation?
6. Please rate your experience of taking part in this consultation.

The proposed answers are as follows

1. Where does your response relate to?

Answer. Hemel Hempstead and Dacorum's Countryside (as distinct from Berkhamsted, Tring, the large villages, or all of Dacorum)

2. To what extent do you agree or disagree with the proposed changes to the strategy?

Answer. Disagree (on a five-point scale of agree to disagree).

See comments below.

3. When thinking about the future, what are the five most important things to you? (Some priorities have been suggested)

- Arts and culture
- Community facilities (libraries, village halls, youth groups and social care) ✓
- Digital communications
- Drainage and flood protection
- Education provision ✓
- Emergency services
- Green space and play facilities
- Healthcare (inc GP provision, hospital care and mental health services) ✓
- Homes and jobs
- Indoor and outdoor sports facilities
- Public transport
- Road network ✓
- Waste and recycling
- Other (specify) **Sewerage**

4. What evidence would you like to comment on?

Answer.

- Sustainability appraisal ✓
- Habitats regulations assessment
- Strategic housing land availability assessment

- Viability study
- Hemel Garden Communities Position Statement ✓

5. How did you hear about this consultation

Answer: received an email from the council

6. Please rate your experience of taking part in this consultation

Section 2 commentary

Nettleden with Potten End Parish Council (NWPEPC) disagrees with the revised draft plan.

NWPEPC welcomes the steps that have been taken since the 2020 draft to reduce the total number of new houses, to reduce the amount of land being released from the Green Belt for development and to maximise the use of urban/brownfield sites. It also recognises the political uncertainty underlying the Plan and the risk of predatory development if more time is taken to allow that uncertainty to be resolved.

However the revisions to the Plan largely only impact housing number and site allocations, as such many of the issues raised by the Parish Council in February 2021 remain and are repeated below.

The Parish Council must reflect the strong objections of its residents to the further release of Green Belt land for development and recommends that more consideration be given to the proposed change to para 140 of the NPPF which is consistent with recent government announcements that “Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting [Local Housing Need (LHN)]”.

It is disingenuous to refer to a “Local” Housing Need in a public consultation when the Plan is based on national housing needs allocated arbitrarily to the Borough by central government. There is no statement of Dacorum’s Housing Needs.

If it is decided for the arguments advanced in the Sustainability Appraisal (SA) to accept the LHN, the Parish Council questions the need to withdraw Green Belt land in this Plan for 3,000 houses in HH01/02 not scheduled for development until after 2040. There is no LHN for this release and the Plan doesn’t put forward any “exceptional circumstances”¹ to justify changes to Green Belt boundaries post 2040. Why isn’t this land being designated as “safeguarded land” to meet “longer-term development needs stretching well beyond the plan period” for which “planning permission ... should only be granted following an update to a plan”²?

Central to the Plan are the proposals around Hemel Garden Communities (HGC) so it doesn’t help that the term “HGC” is used inconsistently across the various Plan documents, sometimes referring to the development site HH01/02, sometimes to the “growth area” (the land both to the north and east of Hemel including that in SADC), and sometimes to the whole town. Whatever is being described, the HGC Position Statement is wholly unsatisfactory as supporting evidence, providing almost no information about this development (see comments under HGC below).

The Plan is fundamentally introverted, dealing solely with the new development sites and ignoring what is likely to be a significant impact on the surrounding rural areas. The most striking example of this introversion is the omission from the [Strategic Transport Modelling Report](#) produced for the 2020 Plan of the impact of the as yet undeveloped HH21 site at the bottom of Pouchen End Lane involving 1,150 new homes. This may be because as planning permission had been granted for that

¹ NPPF para 141

² NPPF para 143 c & d

site it didn't form part of the Plan, but the vehicles associated with that development will impact the rural areas around them just as much as those from HH01/02 (see below).

As with the 2020 plan there are no commitments to invest in the infrastructure necessary for small villages and hamlets in the Borough to prosper or to protect them from increased traffic or to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land³.

There is very limited information available on water for both supply and disposal, but what there is gives cause for significant concern as to the borough's ability to support the proposed LHN; to flag it as "moderate or uncertain" is misleading (see comments under Sustainability Assessment).

In three of the fourteen topic headings in which the sustainability of the emerging plan is assessed (Air Quality, Historic Environment and Transport), the ranking of Hemel and in particular HGC as the preferred option is highly questionable (see comments under Sustainability Assessment).

The Plan omits much of the detail that residents would expect to see regarding infrastructure to be able to make a reasoned judgement of the viability of the proposals, in particular the absence of a transport strategy. We are told that more information will be available for Reg 19, but at that stage we have no ability to influence the submission for Examination.

Finally, NWPEPC regrets the decision to conduct the consultation largely on-line with face-to-face consultation restricted to relatively limited times in Berkhamsted, Hemel and Tring which risks disenfranchising residents who live in rural areas.

The Parish Council wishes to comment on two aspects of the Plan in particular.

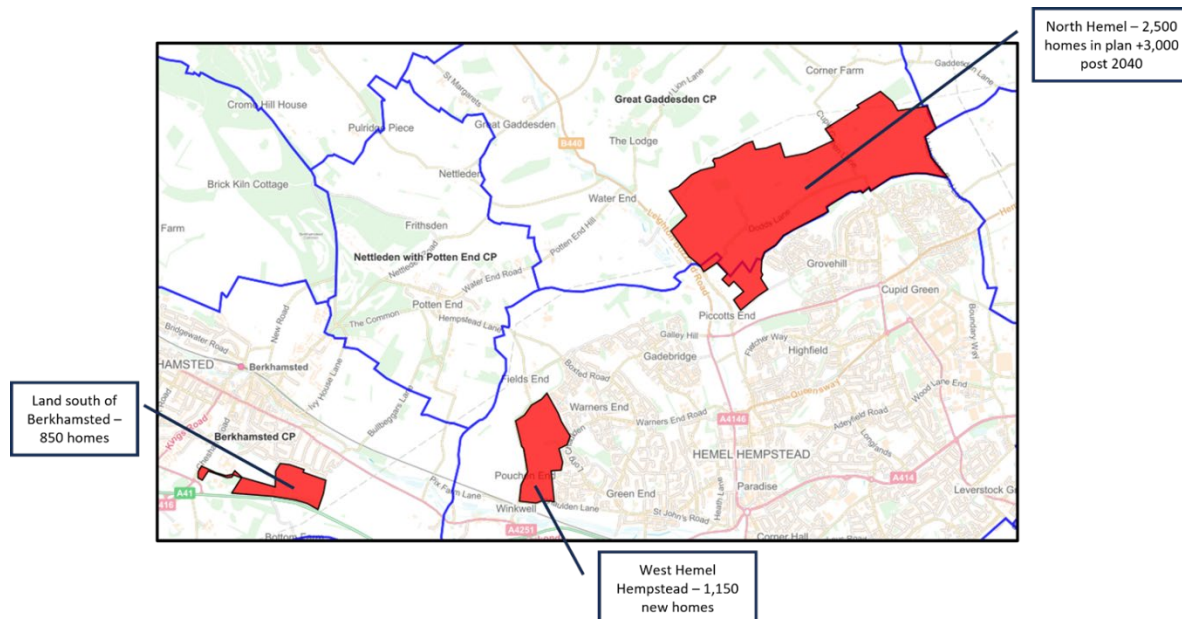
Transport

There are three major developments which are likely to impact traffic flows through the parish:

- 7,900 new homes spread across developments in Berkhamsted (BK01), at the bottom of Pouchen End Lane (HH21), and to the north of Piccotts End/Grovehill (HH01/02) which will surround the parish to the east, south and west (see map below).
- Possible plans to reduce the width of the A414 through Hemel to accommodate public transport about which it is very difficult to find anything other than hints,
- An unspecified "Indicative Sustainable Transport Corridor" which appears without explanation on plans of HGC in the Position Statement, and which may or may not have a relation to the "strategic corridor route between Leighton Buzzard Road and Redbourn Road" which features heavily in the 2020 [Strategic Transport Modelling Report](https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-strategic-transport-modelling-report.pdf?sfvrsn=90d10c9e_6)⁴.

³ NPPF para 142

⁴ Strategic Transport Modelling Report https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-strategic-transport-modelling-report.pdf?sfvrsn=90d10c9e_6



The Strategic Transport Modelling Report is highly technical and difficult to interpret. It hasn't been updated for the 2024 Plan and so includes a larger expansion of Berkhamsted. Notably it excludes the West Hemel Hempstead/Pouchen End Lane development (HH21), presumably as it has already been agreed and so isn't part of the plan, although the traffic from that development must impact the surrounding area. It also appears to exclude any changes to the A414.

The report notes a “notable increase in [traffic] flows ... along Water End Road” and not surprisingly an increase in “rat runs via Potten End Hill” which the Parish Council would fully expect to be mirrored on Pouchen End Lane/Hempstead Lane if HH21 were to be factored in. The Parish Council has instigated a monitoring programme to track vehicle volumes and speeds and has already noted a regular 25% of vehicles on Potten End Hill exceeding the 30mph limit by 10% or more. It is extremely concerned at the lack of any measures to mitigate the impact of more vehicles on the parish.

Education

With the reduction in the number of homes planned for Berkhamsted there are now no plans to build new secondary schools as part of the expansion of Berkhamsted which may result in the catchment areas for existing secondary schools in those areas shrinking and in turn potentially impacting the choice of school for residents in the parish in the future.

Section 4 commentary – Sustainability Appraisal

NWPEPC notes the comments set out in Box 5.1 of the SA which provide useful background to changing government policy and statements regarding establishing LHN and appreciates the difficulty this must cause in arriving at a settled LHN. However the Parish Council must reflect the strong objections of its residents to the further release of Green Belt land and recommends that more consideration be given to the proposed change to para 140 of the NPPF which is consistent with recent government announcements that “Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting [LHN]”

With that caveat and with regard to the appraisal of the emerging plan, NWPEPC has an issue in the way in which Hemel, and specifically HGC, is described and ranked in terms of air quality, historic environment, transport and water, particularly with reference to the Tring sites, as follows:

6.2.6 Air Quality

The SA positions Hemel as the preferred option, stating that “HGC is distant from a train station, but there are clear opportunities to deliver housing growth in a way that supports modal shift away from the private car towards active and public transport, e.g. with the potential to walk to schools and employment and the potential to cycle to Hemel train station (also employment at Harpenden) via an upgraded and extended Nickey Line”.

Other than the distance of HGC from the train station the rest of this paragraph is conjecture and in the case of the Nickey Line misleading as it doesn’t pass through HH01/02. Whilst some people will no doubt enjoy cycling or walking the 4 – 5 kms to and from Hemel station every day (or the 10km to Harpenden), we suspect that many more won’t and will use their cars. The link between new homes and employment within Hemel is unclear and is not covered in the HGC Position Statement; is it the intent that if new employment prospects are not forthcoming that the new housing developments will be constrained? How will this “modal shift” be delivered?

It is incomprehensible that in the same section the land east of Tring is assessed as being “not ideally located in terms of accessing the town centre by walking/cycling or accessing the strategic road network, but parts of the site are reasonably close to the train station” given that Tring town centre and the A41 are less than 2km away from the farthest point of a site which ends almost on top of the train station.

For air quality we would have expected the three towns to be ranked Tring, Berkhamsted, Hemel in descending order of preference.

6.2.39 Historic Environment

The SA positions Hemel as the preferred option stating “HGC overall represents a good opportunity to direct growth to an area with fairly limited historic environment constraint, reflecting the fact that this was a historically rural area prior to development of Hemel Hempstead as a mid-20th Century new town. However, the Gade valley at the western extent of HGC is a historic transport corridor, associated with two conservation areas. Other considerations include encroachment on farmsteads and wider impacts on a historic farmed landscape.

... With regards to Shendish Manor / Fairfield, there is historic environment sensitivity here as the land in question comprises former parkland associated with Grade II listed Shendish Manor.”

Reference to a “historic farmed landscape” doesn’t quite capture the comment in the 2020 – 2038 Emerging Strategy for Growth which refers to “extensive areas of surviving high quality historic landscapes ... and three of particular rarity in the Borough - coaxial field systems (particularly around Gaddesden Row⁵”.

In summary, the Hemel sites have some historic association.

The Berkhamsted sites ranked second are described as not “subject to any particular historic environment constraint, but there is broadly a concern with higher growth leading to traffic that effects the historic character of Berkhamsted town centre”.

In summary, there are no historic constraints on the Berkhamsted sites but a concern about traffic through the historic town centre which should surely be more appropriately referenced under ‘Transport’?

Of the Tring sites which are ranked third in order of preference it is said that “it is not clear that the land in question [Dunsley Park] contributes significantly to the setting of the conservation area or the parkland, and the site benefits from good access to the A41, such that there are limited concerns regarding traffic through the town centre.

⁵ Emerging Strategy for Growth 2020 – 2038 18:14

New Mill appears to be quite unconstrained in historic environment terms, and there are also limited designated historic environment assets constraining Land east of Tring, although encroachment on the Grand Union Canal is a clearly an issue.”

In summary, no historic environment constraint other than some limited impact on the canal by the land east of Tring.

For historic association we would have expected the three towns to be ranked Berkhamsted, Tring, Hemel in descending order of preference.

6.2.64 Transport

The SA positions Hemel as the preferred option stating that “HGC is distant from Hemel town centre and train station. Also, it is noted that the best-connected part is potentially the Gade Valley, which is the most sensitive in a number of environmental respects. However, the work completed to date serves to suggest a significant transport opportunity in wide-ranging respects.

A Transport Vision & Strategy for HGC is underway, and once published it will be possible to draw firmer conclusions regarding minimising the need to travel and supporting modal shift. A concern is that a high proportion of journeys would be taken by private car to certain key destinations such as Watford, Luton, Rothamsted Research and BRE”.

It is impossible to follow the logic which ranks HGC as the preferred option. The site is problematic because of the distance from the town centre and existing public transport; there is no information about future plans for public transport. The environment will be impacted. The impact on the pinch point on the B440 at Water End Bridge is not mentioned. There is no transport vision or strategy on which to justify the statement of a “significant transport opportunity”, let alone analysis of the impact of the vehicles related to 5,500 new homes; and that assumes that the additional 5,500 new homes in the SADC section of HGC primarily use the M1/A414 corridors rather than come round the north of Hemel.

On what basis can Hemel be preferred relative to Tring where both sites are assessed as the third best located for transport despite their proximity to Tring centre, the A41 and the railway station as outlined under air quality above? How can the land east of Tring be described as “marginally the best connected to the train station” when the site ends so close to it?

For transport we would have expected the three towns to be ranked Tring, Berkhamsted, Hemel in descending order of preference.

6.2 Water

The SA is surprisingly quiet on this critical issue, ahead of receiving consultation responses from the Environment Agency, Thames Water and Affinity Water” and not ranking the various scenarios. This was also the case three years ago; it is to be regretted that no progress has been made.

A significant proportion of the area proposed for housing in Dacorum is located within or in the vicinity of the upper River Gade valley, a sensitive and fragile environment. According to the Chalk Stream Restoration Strategy 2021 the Gade is the 6th most abstracted chalk river in a survey of selected chalk rivers between Dorset and Yorkshire carried out for this report, with 48% of its recharge capacity removed from the aquifer in its catchment for the public water supply. The equivalent figures for the Bulbourne and the Ver are 28% and 32% respectively. The target figure for ‘sustainable groundwater abstraction’ is 10% of recharge capacity. Affinity Water is required to deliver ‘sustainability reductions’, i.e. reduced abstractions from the aquifer to relieve the chalk streams across Hertfordshire, in its next plan period, in the second half of this decade.

The sensitivity of the Gade valley is recognised in the Hertfordshire Water Study 2017, which finds that any development within the upper Gade catchment, northwest of Hemel Hempstead, could significantly impact water quality. Increased abstractions from the Gade valley to meet water

demand generated by the proposed housing would damage the Gade still further, when the priority should be a substantial reduction in abstractions.

With regard to waste water we note that “Maple Lodge WwTW (south of Rickmansworth) it is important to note that this serves an extremely large catchment including much of the south east of Buckinghamshire and much of St Albans District. The treatment works is already operating at close to capacity and sometimes gets overwhelmed causing overflows⁶” and “with regards to water quality in the Rivers Bulbourne and Gade, the data shown here does serve to highlight this as an ongoing concern⁷”

Notwithstanding Thames Water’s re-assurances we agree with the SA when it states “there is a clear case for flagging a concern with high growth at Berkhamsted and also supporting HGC⁸”. We strongly disagree with the apparently contradictory assessment later in the SA that “it is appropriate to flag ‘moderate or uncertain’ negative effects at this stage⁹” – this is surely an issue of such significance that it raises questions over the viability of the LHN assessment?

Section 4 commentary – Hemel Garden Communities

It is difficult to see why the HGC Position Statement has been included as a supporting document for the Local Plan as most of it deals with the vision and governance of HGC, all of which is clearly necessary to the project but is of limited (if any?) relevance to the Plan.

It sounds as though the HGC Framework Plan is closer to what we might have expected to see in this context as it apparently “seeks to test the capacity of the site and any reasonable options to deliver 11,000 homes and 10,000 jobs along with other relevant and/or emerging policy requirements including appropriate standards of open space, sustainable drainage, biodiversity net gain, Suitable Alternative Natural Greenspace (SANG), primary and secondary schools, and transport and highways”¹⁰. The Opportunities and Constraints Mapping¹¹ gives a tantalising glimpse of the work undertaken which if it was explained (or even if the full key had been included - the bottom part of the key appears to be missing so that the meaning of some of the symbols is unknown) would have been extremely valuable. Unfortunately the Framework Plan is not available.

It doesn’t help that the term “HGC” is used inconsistently across the various Plan documents. Sometimes it refers specifically to the development site HH01/02 as in the Sustainability Assessment where it refers to HGC being “subject to landscape constraint given the adjacent AONB and also noting Green Belt sensitivity”¹², sometimes to the “growth area” (the land both to the north and east of Hemel including that in SADC)¹³, and sometimes it “covers the town of Hemel Hempstead, within the borough of Dacorum, as well as proposed growth areas straddling both Dacorum and St Albans district to the north and east of the town and wider movement routes beyond”¹⁴. This creates a fundamental problem when trying to comment on the Plan.

It’s not even clear what the roll-out of homes in HH01/02 is likely to be. The 2020 draft plan assumed 1,500 homes in HH01 to the west of the site with a further 4,000 in HH02 in the east after 2038. The current SA¹⁵ states that the assumed capacity of the now merged HH01/02 is 2,500 homes in the plan period with 3,000 beyond “as reflected in the HGC Position Statement, 2023” - we’re unable to

⁶ SA 6.2.74

⁷ SA 6.2.76

⁸ SA 6.2.72

⁹ SA 6.2.79

¹⁰ HGC Position Statement p44

¹¹ HGC Position Statement Fig 19

¹² SA 9.13.1

¹³ HGC Position Statement p44

¹⁴ HGC Position Statement p5

¹⁵ SA 5.4.19

identify anything specifically dealing with HH01/02 in the Position Statement. However there are two sub-sites on the western edge of HH01/02 (what would have been HH01 in the 2020 Plan) which are designated as “potential development sites subject to further testing”¹⁶. It’s not clear what this testing might be, what risk might be associated with it, or whether the homes in these sub-sites have been counted in the 5,500 (which would appear contrary to the statement in the SA that “a suitably conservative level and rate of supply is assumed”¹⁷) or whether they are in addition. No justification is advanced as to why the Plan is seeking the release of Green Belt for development outside the Plan horizon.

It’s also not clear whether the Transport Vision and Strategy document exists as implied by the Position Statement¹⁸ or has yet to be completed as stated in the SA¹⁹. Either way it appears to be very introverted, focusing on transport inside Hemel, or at best to Harpenden and the A414 corridor. Journeys within Hemel are clearly important but increasing the number of homes in Hemel by 11,742 (together with the 5,500 in the SADC portion of HGC) over the lifetime of the Plan must have a knock-on impact to journeys outside as well as inside the town and this is completely ignored.

Meanwhile the enigmatically titled “Indicative Sustainable Transport Corridor” only exists on maps with no explanatory narrative. Whatever this transport corridor is it would appear to be very important for the development areas to the north and east of Hemel since it runs through the middle of them. Judging from the transport studies undertaken for the 2020 draft Local Plan²⁰ the exact nature and extent of this route could have a very significant impact on transport volumes up the Gade Valley on the B440 with its pinch point at the Water End Bridge and via Potten End Hill to the pinch points leading into Berkhamsted.

For communities such as those in Nettleden with Potten End Parish on the outskirts of Hemel the critical question in commenting on the Plan is what is going to happen to traffic outside the development areas. The HGC Position Statement fails to even start to address this issue.

¹⁶ HGC Position Statement Fig 20

¹⁷ SA 5.4.19

¹⁸ HGC Position Statement p50

¹⁹ SA 9.15.1

²⁰ [COMET Forecasting Report \(dacorum.gov.uk\)](https://dacorum.gov.uk/comet-forecasting-report)