



Consultation on the Draft Dacorum Local Plan (2020-2038) January 2021

Summary

Nash Mills Parish Council (NMPC) have until 28th February to comment on the [draft Dacorum Local Plan](#). A working group met to discuss the report and to formulate responses for Council to consider, and if approved, submit to Dacorum Borough Council.

Working group considerations and comments

The working group has reviewed the consultation documents at a high level (together with concerns from CPRE and other parish councils) and conclude the following:

- The impact on Nash Mills parish will be minimal. With the exception of the new crematorium at Bunkers Park, there is no growth planned. A high volume of additional traffic through the parish, based on the planned growth areas, seems unlikely. We have a question relating to the boundary of the Bunkers Park development which incorporates an area of the park itself. It may be that this is due to a percentage of open space being allocated to all developments.
- We can re-share our concerns following developments in Nash Mills and the local area in the hope that it will have a small amount of influence (these relate to space and car parking). We have shared this in previous consultations but it is, perhaps, worth including once again.
- We have read concerns shared CPRE (The Countryside charity) and acknowledge that, with their expertise, they are best placed comment on the data related to green belt, AONB and chalk streams. However, where we agree, we have confirmed support of these comments.

Additional information regarding reclassification of The Denes

Not relevant to the consultation itself but interesting for us as a Parish Council, the draft local plan also brought to light a change in classification of the Retail / Leisure hierarchy for The Denes (from local centre to neighbourhood centre). Details are included in an appendix at the end of this report.

Consultation comments for review and (if agreed) to submit

Vision and Strategic Objectives

Question 1: Do you think the overarching vision, the vision for Dacorum's places and strategic objectives are right for the Borough?

At a high level, yes. However, we have comments about the detail in some areas. These are:

- **Housing projections** – accuracy of the data used and questioned fairness of allocation to Dacorum
- **Green belt** – we understand the need to use but have concerns that over projection could lead to unnecessary use of protected land
- **Chalk streams** – concern about further damage in order to supply water to additional houses
- **Transport options** – the approach to car ownership / usage and associated parking, reliable passenger transport and safe cycle paths
- **Density of developments** – available internal space for residents, impacts on light and the potential effect on mental health

The Sustainable Development Strategy

Question 2: Do you have specific comments about the Sustainable Development Strategy?

The Housing Strategy - Potential overprovision of housing

We support the need for additional housing, in particular affordable housing, and understand the potential need to encroach on existing green belt in order to meet housing needs.

However, we support comments from CPRE (The Countryside Charity) and fellow parish councils that data used to estimate housing requirements should be the most current data available (using Office of National Statistics data from 2018 rather than 2014) and that Dacorum's allocation is fair in comparison to other boroughs. We note that paragraph 7.5 in the draft plan also acknowledges that proposed changes to government methods of calculating housing could mean that the figure used in the plan is not correct.

We need to be sure that over-estimations do not lead to unnecessary use of green belt.

The plan also needs to further consider changes likely to occur as a result of the pandemic. Will unused office space provide opportunity for conversion to residential property, minimising the need to build on green belt?

Guiding Development

Question 3: Do you have specific comments about any of the Guiding Development policies?

ENVIRONMENT AND BIODIVERSITY

Potential harm to Chilterns AONB

While the proposed provision of housing will probably have minimal impact on Nash Mills and the green belt areas within the parish, we do support concerns voiced by other parish councils and CPRE that the scale of proposed development will cause harm to green belt across Dacorum and the Chilterns AONB, including longstanding eco-systems and early plans to extend the AONB or upgrade its status to National Park.

Further harm to chalk streams

It is recognised in the plan that there is a climate change emergency and that there is a potential for increased drought. Paragraph 18.39 states that *“The three chalk streams of the Rivers Bulbourne, Gade and Ver within Dacorum are considered of poor or moderate status against the Water Framework Directive”*. We support the concerns raised by CPRE that the proposed developments would have a severe impact on water supply and waste water disposal. According to CPRE, current supplies would be put under severe strain meaning additional water extraction from the chalk aquifer and further damage to the chalk streams. They also state that new supplies of water are not likely to be possible until after 2030.

Protecting green spaces

We are pleased to see that every residential growth development includes provision for public open space (through Policy DM63) and a country park within the largest site in Hemel Hempstead and that these spaces are protected from future development (para 22.45). How can we be sure that smaller green space will not be used for additional parking as sometimes occurs in existing developments?

SUSTAINABLE TRANSPORT AND CONNECTIVITY

Parking and car ownership

We fully support the vision to encourage and promote sustainable travel for local everyday journeys, where work locations and local centres for retail and leisure allow. However, we have concerns about the vision for reduced car ownership and the related parking allocations.

We are located with convenient access to the M25, M1 and A41 and, although strategies to encourage sustainable travel around town may well be successful, the proximity to major road networks give residents the choice to use a car for journeys outside of the local area or to feel secure if travelling during later hours. Visitors to residents of Dacorum may also travel via the road networks. As stated in the newly adopted parking standards, car ownership figures from the 2001 – 2011 census showed little change and we are yet to know what the 2021 census will show. It is also acknowledged in the plan (and within the adopted parking standards) that the local topology can prove a challenge for some people.

We agree that a decrease in car use for everyday journeys should be encouraged, however applying flexibility to adopted parking standards to provide insufficient parking at residential properties will continue to result in on-street parking stress and obstructive / dangerous parking.

Local developments in Nash Mills are situated within easy reach of Apsley Railway Station and many residents use this facility. However, the majority of residents will still choose to own a car.

Our experience of parking issues in Nash Mills and nearby Apsley Lock

Nash Mills Wharf was built with insufficient parking. The road is private and pavement parking is managed by a private company. This means that the development itself is not littered by cars parked on pavements. However, the unfortunate neighbouring roads bear the brunt of this decision.

Apsley Lock, just outside Nash Mills, was originally built with green verges along all the roads. These were quickly ruined by parked cars and, within a short time, replaced by tarmac. Sadly, the aesthetics of this lovely development are somewhat upset by the huge number of cars parked on pavements. The parking in this estate is still a problem but is, at least, self-contained.

In contrast, **the Willows** (which sits between the two) is far less dense with minimal on road / pavement parking and provides a perfect example of what works well for an out of town development.

Cycle paths / lanes

In order to successfully increase cycling (including electric bikes) as an attractive option locally, safe cycle paths will need to be introduced into existing areas as well as new developments.

Reliable passenger transport

If travel on passenger transport is to be encouraged, that transport will need to be reliable. A great deal of needless stress was caused to many Nash Mills and Apsley residents when London Midland was replaced by London North Western in 2018. Trains were regularly late or cancelled, carriages removed and timetables changed to reduce trains, delivering a generally unreliable service during the busiest times. If we want to encourage sustainable passenger transport then there needs to be a way for providers to be held to account.

Two Waters development in Apsley

The plan shows growth plans for the Two Waters area in Apsley and mention of infrastructure development across the A414. The Infrastructure Development Plan identifies “congestion in the Two Waters area including London Road/Two Waters Road and Durrants Hill Road” and mentions ‘**Package 1**’ which includes “The reorganisation of road space in the Apsley/Two Waters area to facilitate an improved streetscape”. The detail of this (and the impact on car use in the area) is not clear. A change to improve this junction and the traffic problems would, of course, be welcome. However, the nature of the retail outlets in Apsley (DIY, weekly shopping, home supplies) and it’s elevation to ‘district centre’ would surely necessitate continued easy access for cars to transport likely purchases in this area. Reducing this could further increase traffic issues through Apsley.

HEALTHY COMMUNITIES

Accessibility of hospital facilities

It would feel remiss not to re-iterate the importance of a centrally located hospital for the growth areas. We do not support the decision to retain the a main hospital in Watford, given the growth in Dacorum.

Potential impacts for mental health (space and light)

Paragraph 22.1 states “The health and wellbeing of our communities is crucially important to delivering long term sustainable development and placemaking. This includes physical, mental and social wellbeing.” And under paragraph 22.23, it is stated that planning “has great potential to influence health” and key areas include open space and housing design. We have some concerns about the lack of space and light in densely developed areas and the impact on mental health, i.e. the closeness of the buildings vs. the ability to see some open space from your own home, the implications this has on light entering the home and the fact that the national standards for internal space are “optional” for local authorities to apply.

The Delivery Strategies

Question 4: Do you have specific comments about any of the Delivery Strategies?

No

Proposals and Sites

Question 5: Do you have specific comments about any of the Proposals and Sites?

The plot allocated for the crematorium at Bunkers Lane has a red border that incorporates part of Bunkers Park, including the access road and car park. We would like to confirm that the area of Bunkers Park shown is not under threat of further development and that the carpark and access route to reach the car park will still be available for users of the park.

Sustainability Appraisal

Question 6: Do you have any comments on the Sustainability Appraisal that accompanies the Plan?

No

Evidence Base

Question 7: Do you agree that the Evidence Base that accompanies the Plan is adequate, up-to-date and relevant?

We support concerns from CPRE that ONS data used could be more up to date (2018, rather than 2014) and that the Water Scoping Study used was produced in 2010 and likely contains some outdated information.

National Policy and Guidance

Question 8: Do you think the Plan is consistent with the National Planning Policy Framework (NPPF) and supporting guidance?

Yes / No

In the main yes, although we have a couple of comments:

The NPPF emphasizes the importance of green belt and its use only in “exceptional circumstances”. The data used to calculate housing and all brownfield sites (including those related to office space post pandemic) should be explored before resorting to this route.

While sustainable transport is prioritised, the NPPF states that planning should offer a “genuine choice of transport modes” and that “local car ownership levels” should be taken into account. Given the most recent census data and our proximity to major road networks, we feel it should be recognised that owning a car (even if not used for all journeys) will still be a choice for many people.

Any other comments on the Emerging Strategy for Growth

Question 9: Do you have any other comments on the Plan?

Based on experience of developments in Nash Mills, we’re interested to know the processes in place to minimise developers from being able to do any of the following:

- Reducing the amount of affordable housing by claiming it is unviable?
- Not providing the parking standards laid out for specific types / size of accommodation?
- Gaining approval for development to include retail or community space which is reduced or removed during various iterations of plans to make way for additional residential space
- Repeatedly submitting plans with minimal change (without meeting policies/standards)

APPENDIX

Additional information regarding reclassification of The Denes

While reviewing the documents, we noted the following and thought it useful to share:

Following the 'South West Hertfordshire Retail and Leisure Study (2018)', there has been a change to the classification of The Denes in the Retail/Leisure hierarchy. In the previous Dacorum Core Strategy (adopted in 2013), The Denes was listed as '**Local Centre - with a neighbourhood shopping function**'. Others in this category included Leverstock Green, Bennets End, Adeyfield and Apsley.

In the new draft plan, The Denes is listed as a '**Neighbourhood Centre**', which seems to be related to the number of shops contained. Leverstock Green is also listed as a Neighbourhood Centre, whereas Bennetts End and Adeyfield remain as Local Centres.

In the 2018 study, Apsley was categorised at a 'local centre' but in the draft Dacorum Local Plan, it has been upgraded to 'district centre' due to the number of retail units and the planned growth for additional retail at Two Waters.

The draft plan describes 'Neighbourhood Centres and Scattered Local shops' as ...

"Small parades of shops of purely neighbourhood significance are not classified as 'centres' in the NPPF. Nevertheless, these centres fulfil an important role in providing local shops, services and community facilities, which merit protection where appropriate."

The Retail / Leisure hierarchy is now covered by two separate policies:

- Policy DM19 - Mix of uses in Town, District and Local Centres
- Policy DM20 – Neighbourhood Centres and Scattered Local Shops