

## **DACORUM BOROUGH COUNCIL SITE ALLOCATIONS EXAMINATION: OCTOBER 2016**

### **Statement from CPRE Hertfordshire**

#### **MATTER 11 – POLICY LA5: Icknield Way, West of Tring, INSPECTOR’S QUESTIONS 1**

#### **AND 2.**

1. I am Elizabeth Hamilton, representing Campaign to Protect Rural England Hertfordshire (CPRE).
2. This statement complements CPRE's original representations on the Site Allocations Pre-submission DPD 2014, and Focused Changes 2015, which still apply, and seeks to address the Inspector's questions as set out in her Matters, Issues and Questions document.

#### **Question 1: Has the Green Belt boundary been correctly defined?**

3. In document SUB2 Site Allocations Pre-Submission Map Book incorporating the Focused Changes 2016, page 10, GB/9 LA5 West Tring shows the amended (on the right-hand side) map of 'Land to be removed from the Green Belt'. However, the 'Key to Proposed Green Belt Boundary Amendments' on page 5 of SUB2 has not been applied to the GB/9 map. The proposed inner Green Belt boundary should be indicated by a solid blue line. In addition the outer Green Belt boundary should be shown differently, and its relationship with the Chilterns Area of Outstanding Natural Beauty (Chilterns AONB), which it overlaps, should be indicated.
4. On the GB/9 Amended Map referred to above, the amendments comprise two additional areas to be removed from the Green Belt, which were not indicated in the proposals in the adopted Core Strategy. The land to be removed from the Green Belt in the Core Strategy LA5 proposal is the area shown in the left-hand-side map on page 10 of SUB2. These two additional areas are proposed to accommodate a cemetery extension and a traveller site. The former, expressed as 'a potential extension to the cemetery', was to be included within the original LA5 proposal area contained within the Core Strategy. The traveller site was not mentioned in the Core Strategy in the context of LA5.
5. The Tring Vision Diagram on page 168 of the Core Strategy (reproduced on page 5 in the LA5 Draft Master Plan, Document LA47) does not show the now-proposed extension to the employment area, as shown in Policy Map E/1 on page 58 of SUB2, although this was included in the Core Strategy written principles for LA5. In CPRE's view no exceptional circumstances have been presented or exist to justify the removal of the proposed employment area land from the Green Belt.
6. CPRE has already made representations with reference to Matters 2, 4 and 6 in respect of the proposed removal of the Local Allocations sites from the Green Belt. In particular CPRE has pointed out the absence of exceptional circumstances required to justify removal of these sites from the Green Belt, such that the removal would be contrary to national policy in respect of the Green Belt. CPRE has also pointed out that Policy CS3 of the Core Strategy sets out specific provisions for the Local Allocations, namely that they are to be delivered only from 2021 and then only if required, and would be managed as countryside (i.e. in the case of LA5 as Green Belt ) until required.
7. In Policy LA5 of SUB1 on page 68 the description of LA5 is incorrectly defined in two respects. Firstly, it should reference the map (as amended) in Policy GB/9 in SUB2. Secondly, it states that 'all of LA5 has been released from the Green Belt, except for the

western fields open space'. This sentence is factually incorrect and the 'western fields open space' is not properly defined by reference to the map in Policy GB/9.

8. In our view the Indicative Spatial Layout on page 70 of SUB1 is also deficient in not showing clearly the Green Belt (current and as proposed) or the Chilterns AONB.

9. Paragraph 6.27 of SUB1 states that delivery of LA5 will now be brought forward prior to 2021. This is contrary to Local Allocations principles in Policy CS3 of the Core Strategy and to paragraph 8.17 of the Core Strategy which states: *Local allocations will be held back to encourage urban sites to come forward earlier, to retain countryside for longer and to ensure an appropriate contribution to land supply in the later part of the plan period.* There is no indication in SUB1 of how and when the decision to bring forward LA5 immediately was made. For the reasons already set out by CPRE in respect of Matters 2,4 and 6 CPRE believes that this decision is premature, unjustified and contrary to national policy, and in particular no exceptional circumstances exist to justify this decision.

**Question 2: Has the effect of the proposed cemetery, play area and traveller site on the AONB been fully considered?**

10. In CPRE's view development beyond the western edge of the existing settlement will not be in conformity with paragraph 115 of the NPPF.

11. Core Strategy Policy CS24 requires that development will have regard to the policies set out in the Chilterns Conservation Board's (CCB) Management Plan. In CPRE's view the proposals will not conform to Policy L5 of the current (2014-19) Chilterns AONB Management Plan: 'Developments which detract from the Chilterns' special character will be resisted'. The Plan also states (on page 23): 'the absence of visual intrusiveness of structures and buildings all add to a sense of tranquillity (which is) being continuously and insidiously lost'.

12. CPRE's view is that the proposed cemetery extension, NEAP play area and traveller site (all proposed to be located within the AONB) will detract from the character and tranquillity of the AONB in and around the LA5 site. In addition the NEAP play area which is proposed for the 'western fields' will be located on land retained within the Green Belt as well as being within the AONB, and as such will impact on the openness of the Green Belt.

13. Were sports pitches to be located in the 'western fields' within the AONB and the Green Belt, they would impact on the current rural feel and views from the urban edge and the public footpaths to the AONB beyond, as well as on the openness of the Green Belt. Associated parking on this site would also impact on the AONB and the Green Belt. If there is a need for additional sports pitches within Tring they would be better located in a less isolated position within the town, capable of utilising existing built facilities.

14. The current (2014-19) Chilterns AONB Management Plan also states (on page 22): 'the potential impact of development in the area surrounding the AONB needs to be given greater weight as inappropriate'. In CPRE's opinion views to the LA5 site 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.

15. The footpath leaving the western edge of the existing settlement running north-west towards Beeches Farm offers an immediate rural feel and excellent views of the AONB, especially the wooded higher land to the south. The same applies to the footpath running north-south across this triangle of land which is alongside the AONB boundary.

16. 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 at present 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, also fulfilling one of the functions of the Green Belt to maintain openness: this would be lost if these fields were developed.

17. 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. Development on the site would further impact on the otherwise fine views from here of the chalk scarp within the AONB to the north.

18. We would invite the Inspector to make her own site visit to LA5, and in particular to the footpaths and vantage points described in the preceding paragraphs.