



## Clerk Report –Dacorum Local Plan to 2041 November 2024

### Council Actions Required (agenda items)

- To consider any comments on the suggested response (circulated) for the amended Dacorum Local Plan.

*Version below approved by DBC full council Wednesday 15<sup>th</sup> October 2024*

*Consultation open midday on Monday 4 November and closes midday on Tuesday 17 December 2024.*

### Background

- NMPC previously commented on the Dacorum Borough Council (DBC) Local Plan at Regulation 18 stage (that report can be found at the end of this report).
- At Regulation 19 the council can only comment on whether the Local Plan meets all the necessary legal requirements, is sound and how DBC has worked with others.
- DBC has added additional sites into the plan since the regulation 18 version was approved.
- DBC have stated that the additional sites are due to their obligations to comply with Govt planning targets, however initially DBC reduced the number of Green Belt sites included at regulation 18 following public objections and removed some of the sites completely-this included the Shendish site.
- **These sites have now been reintroduced in this latest submission.**
- It could be argued that in this case DBC have not worked well 'with others' under the definitions for comment listed above.

Having a local plan in place does offer some protection, without a valid local plan all areas are at risk of speculative planning applications that have no adopted framework to be constrained by, on that basis a plan in some form could be considered better than having no plan.

### Sources

#### **DBC Local Plan**

[Dacorum Local Plan to 2041 - Pre-submission version for approval](#)

#### **CPRE response (2023) to DBC local Plan**

[Dacorum Local Plan, Revised Strategy for Growth - our final submittal - CPRE Hertfordshire Dacorum-Local-Plan-Revised-Strategy-CPRE-Hertfordshire-response-Dec-2023-F.pdf](#)

### Considerations & Clerk Recommendations

There is no recommendation from the clerk on this proposal.

Council needs to consider whether they wish to respond.

- Council could determine to reiterate their previous concerns.

In addition, Lead Cllr Planning, Cllr Briggs and the clerk have suggested that council may wish to consider the items listed below

**Page 33 - paragraph 2.49** includes Nash Mills (and Kings Langley) in the Two Waters Opportunity Area which I found surprising. This could bring a risk of getting bundled into any future changes to parking standards etc.

### Clerk comments

Choosing to merge the predominantly built up and largely commercial corridor of Apsley with the historic village of Kings Langley and the separate settlement of Nash Mills, with its historical assets and large green spaces, misrepresents the true delineation of these three, very different settlements. Delineation which is important to retain the individual characteristics and openness of the local Green Belt Sites. It feels that Nash Mills has been added without due consideration to enable building quotas to be achieved as there is no detail regarding any impact on our parish within this section.

The needs of these areas are very different and should be considered separately, or assurances should be given that the individuality will be considered and not impacted should there be amendments to items such as the DBC parking standards.

Whilst the regeneration of the Apsley side is well documented there is no mention of the assessment of the needs of the residents from Nash Mills who will be greatly impacted when they try to reach local secondary schools or the local shops. It is likely that the roads through Nash Mills will also be impacted by the increase in road traffic, particularly if people from the new developments are looking for direct routes through to the M1 and M25 as the current routes through Apsley and Kings Langley are renowned for being congested at all times of day.

There also appears to be no consideration of discussion with the relevant authorities regarding the train service. Whilst DBC are not responsible for the delivery of train services, they are responsible for ensuring that the impact of proposed development in areas is addressed. Currently the service is already oversubscribed, poorly managed and not fit for purpose. Capacity is insufficient. An influx of additional users must be addressed and strategic consultation with all stakeholders should be arranged at the earliest possible opportunity.

### **Chapter 6 - Natural Environment**

Development of Shendish would seem to be contrary to many points stated in this section.

### Clerk Comments

The policy states 'all development shall help conserve, restore or enhance the prevailing quality, character and condition of Dacorum's natural and historic landscape'.

The development of Shendish does not comply with this and the release of so many hectares of Green Belt Land and the impact on Biodiversity is contrary to both the Green Belt policies and DBC Biodiversity aims. The proposal for Shendish directly contradicts the majority of the statements made by DBC under section 6 of the revised local plan. The impact of the 'openness' of the views from Nash Mills across to Shendish is diametrically opposed to the NPPF Green Belt guidance.

Even with the newly elected Govt's proposals to overhaul The National Planning Policy Framework (NPPF) <sup>1</sup>there appears to be no recent evidence of a Green Belt review in our local area (as outlined below) therefore the plan does not comply with the statement below. The rich natural habitat at Shendish could most definitely not be classed as 'poor quality' grey belt with its rich and diverse flora and fauna.

*3. Instead of the haphazard release we see under the status quo, release will be strategic and underpinned by clear safeguards. We propose to make changes to the NPPF to make clear that, where a local planning authority is unable to meet housing, commercial or other needs after fully considering all opportunities to make effective and efficient use of brownfield and wider opportunities, it should undertake a Green Belt review. This review should look to release poor quality grey belt land from the Green Belt through both plan-making and decision-making to meet local needs. This release will be subject to the sustainable development principles that underpin national planning policy, and to clear 'golden rules' as set out later in this chapter.*

---

<sup>1</sup> [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system)

**Page 9 Waste water infrastructure** “The Emerging Strategy for Growth” made no mention of the specific need for waste water infrastructure improvements.

We support the comments below made in the CPRE submission at Regulation 18 and would like confirmation that this matter has been fully investigated and mitigated.

*‘Since the Dacorum Emerging Strategy for Growth was published in November 2020 the extent of raw sewage releases into rivers and sewage pollution in other places has become increasingly apparent. This is due to inadequate existing waste water infrastructure, which is causing huge damage to the quality of the water environment and threatening the survival of its wildlife and poses a threat to human health. The 2010 Water Cycle Study - Scoping Study, a document which remains in the evidence base for the new Dacorum Local Plan, was originally intended to inform the development of the growth scenarios set out in the Regional Spatial Strategy. The Study indicates major constraints to development in Hemel Hempstead in terms of wastewater treatment works and sewerage capacity, flood risk and the water environment, needing very extensive infrastructure improvements which are not specified. The Emerging Strategy for Growth made no mention of the specific need for wastewater infrastructure improvements and no further information is provided in the Revised Strategy consultation. Such infrastructure is required to be delivered by legislation, so it is therefore essential for the protection of waterways that the new Dacorum Local Plan include provision for waste water infrastructure improvements.’*

**Additional Items that we recent raised with St Albans District Council for their Local Plan Regulation 19 consultation overlap with this DBC proposal.**

#### Healthcare

NMPC would be keen to see an impact assessment of the St Albans (and Dacorum) revised local plans on the WHHT hospital redevelopment plans.

Whilst there is some mention in the Reg19 draft around healthcare there is no confirmation that there has been proven engagement with the relevant authorities to ensure that the population growth within Dacorum and the wider area has been adequately scrutinised. It is imperative that the currently under resourced local healthcare provision be made fit for purpose, ideally pre-development but certainly from when the first inhabitants move in and of course going forward to support the population growth caused by these developments. There is a danger that there will be a long wait with still no adequate facilities for Dacorum and St Albans residents or that funding may not be adequately earmarked to meet the obvious need.

#### Bunkers Park

NMPC welcomes an extension to Bunkers Park as part of SANG (Suitable Alternative Natural Green Space) included under the St Albans Local Plan regulation 19 submission whilst noting that the increased usage would exacerbate the need for an increase in parking provision.

NMPC would be wishing to make representation for width restrictions on Bunkers Lane.

NMPC would be wishing to make representation on the concerns received from residents regarding the impact of additional traffic on both Chambersbury Lane and Georgewood Road.

Nikki Bugden  
Clerk & RFO

1/11/2024

## **FOR REFERENCE**

### **Clerk comments to DBC re Local Plan November 2023**

NMPC welcome the opportunity to comment on the draft local plan for Dacorum. We have also been consulted on the new Three Rivers Plan (flagged as saving the green belt) and also the St Albans Plan.

Our concerns and comments are namely as follows.

#### **Transport**

Currently our parish represents a large number of commuters who are dealing with poor services via our local train stations, a major commuter route into London which has seen services cut and rolling stock which is not fit for the volume of users. The overcrowding also gives rise to concerns regarding the safety of those travelling so densely in too few carriages on the busiest services.

#### **Road Network**

NMPC have concerns about the impact of building works, particularly in the Apsley area as this is already gridlocked at multiple times of the day/weekend and there does not appear to be any mitigation or consideration of this existing issue.

This will be exacerbated with the new proposed Kings Langley Local Plan which is looking to install traffic calming measures in the village. This is likely to create a 'rat run' route through our parish as the fastest alternative route from the M25 to central Hemel Hempstead and there are no measures currently in place (or suggested) to mitigate this.

This does not just impact residents who are travelling to school or work, but it also impacts on the ability of residents to reach any medical services, particularly in emergencies. It should be noted that this concern extends to all emergency services attending incidents. If there is gridlock already in our local area, how can we ensure that ALL emergency services are able to attend swiftly and safely otherwise lives will be at risk?

#### **Green Space**

NMPC welcomes an extension to Bunkers Park as part of SANG (Suitable Alternative Natural Green Space) but would urge DBC to consider that the increased usage would exacerbate the need for an increase in parking provision.

NMPC would like to make representation for width restrictions on Bunkers Lane to mitigate the increased traffic caused by this site being earmarked as local green space supporting the growth of Dacorum and St Albans.

#### **Healthcare**

HH still has no hospital provision, even suggestions of a new healthcare facility do not alter the fact that a growing town of this size does not have a hospital and residents have to navigate difficulties in traffic and poor, irregular and unreliable public transport provision hindering their ability to reach to the nearest hospital for both emergency and routine treatment.

HGC would have a major impact on medical service provision and re-poses the question whether the Watford General Hospital redevelopment in its current location best serves the potential increase in population in the WHHT area.

**NMPC would like to recommend an impact assessment of the St Albans (and Dacorum) revised local plans on the WHHT hospital redevelopment plans.**

#### **Water Supply**

NMPC have experienced water shortages and hose pipe bans regularly throughout the summer months and are keen to know how the existing water supplies will sustain the level of development suggested for Dacorum, Three Rivers and St Albans. There is also a concern regarding potential flooding and rainwater run off as local issues are seen where development has taken place on areas that have previously flooded and now do not have adequate run off provision.

#### **Network House/ Apsley two development 22/02333/MFA**

NMPC were unable to find any reference to this large application in the allocations in the draft plan and will be raising this directly with the strategic planning team.