



Public Document Pack

DEVELOPMENT MANAGEMENT AGENDA

**THURSDAY 6 OCTOBER 2022 AT 7.00 PM
COUNCIL CHAMBER, THE FORUM**

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The Councillors listed below are requested to attend the above meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Membership

Councillor Guest (Chairman)	Councillor Douris
Councillor C Wyatt-Lowe	Councillor Williams
Councillor Beauchamp (Vice-Chairman)	Councillor Hollinghurst
Councillor Durrant	Councillor Stevens
Councillor Hobson	Councillor Tindall
Councillor Maddern	Councillor Riddick
Councillor McDowell	

For further information, please contact Corporate and Democratic Support or 01442 228209

AGENDA

1. MINUTES

To confirm the minutes of the previous meeting (these are circulated separately)

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence

3. DECLARATIONS OF INTEREST

To receive any declarations of interest

A member with a disclosable pecuniary interest or a personal interest in a matter who attends

a meeting of the authority at which the matter is considered -

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent and, if the interest is a disclosable pecuniary interest, or a personal interest which is also prejudicial
- (ii) may not participate in any discussion or vote on the matter (and must withdraw to the public seating area) unless they have been granted a dispensation.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Members' Register of Interests, or is not the subject of a pending notification, must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal and prejudicial interests are defined in Part 2 of the Code of Conduct For Members

[If a member is in any doubt as to whether they have an interest which should be declared they should seek the advice of the Monitoring Officer before the start of the meeting]

It is requested that Members declare their interest at the beginning of the relevant agenda item and it will be noted by the Committee Clerk for inclusion in the minutes.

4. PUBLIC PARTICIPATION

An opportunity for members of the public to make statements or ask questions in accordance with the rules as to public participation.

Time per speaker	Total Time Available	How to let us know	When we need to
3 minutes	Where more than 1 person wishes to speak on a planning application, the shared time is increased from 3 minutes to 5 minutes.	In writing or by phone	5pm the day before meeting.

You need to inform the council in advance if you wish to speak by contacting Member Support on Tel: 01442 228209 or by email: Member.support@dacorum.gov.uk

The Development Management Committee will finish at 10.30pm and any unheard applications will be deferred to the next meeting.

There are limits on how much of each meeting can be taken up with people having their say and how long each person can speak for. The permitted times are specified in the table above and are allocated for each of the following on a 'first come, first served basis':

- Town/Parish Council and Neighbourhood Associations;
- Objectors to an application;
- Supporters of the application.

Every person must, when invited to do so, address their statement or question to the Chairman of the Committee.

Every person must after making a statement or asking a question take their seat to listen to the reply or if they wish join the public for the rest of the meeting or leave the meeting.

The questioner may not ask the same or a similar question within a six month period except for the following circumstances:

- (a) deferred planning applications which have foregone a significant or material change since originally being considered
- (b) resubmitted planning applications which have foregone a significant or material change
- (c) any issues which are resubmitted to Committee in view of further facts or information to be considered.

At a meeting of the Development Management Committee, a person, or their representative, may speak on a particular planning application, provided that it is on the agenda to be considered at the meeting.

Please note: If an application is recommended for approval, only objectors can invoke public speaking and then supporters will have the right to reply. Applicants can only invoke speaking rights where the application recommended for refusal.

5. INDEX TO PLANNING APPLICATIONS

Item 5a 22/01187/MOA - Hybrid application (with access details of two main access points from Bulbourne Road and Station road in full and the main development on the rest of the site in outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 use class C2 dwellings); a new local centre and sports /community hub, primary school, secondary school, and public open spaces including creation of a suitable alternative natural green space. Land East Of Tring

- (a) Item 5a 22/01187/MOA - Hybrid application (with access details of two main access points from Bulbourne Road and Station road in full and the main development on the rest of the site in outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 use class C2 dwellings); a new local centre and sports /community hub, primary school, secondary school, and public open spaces including creation of a suitable alternative natural green space. Land East Of Tring (Pages 5 - 521)

ITEM NUMBER:

22/01187/MOA	Hybrid application (with access details of two main access points from Bulbourne Road and Station road in full and the main development on the rest of the site in outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 use class C2 dwellings); a new local centre and sports /community hub, primary school, secondary school, and public open spaces including creation of a suitable alternative natural green space.	
Site Address:	Land East Of Tring	
Applicant/Agent:	Mr Tim Noden	Professor Bob May
Case Officer:	Martin Stickleby	
Parish/Ward:	Tring Town Council	Tring East
Referral to Committee:	The application is for major development with a proposed legal agreement.	

1. RECOMMENDATION

1.1 That planning permission be refused.

2. INTRODUCTION

2.1 The following report into the proposed development of ‘Land East of Tring’ summarises the proposed scheme and to assess it against local and national planning policy guidance and recommendations. It sets out the other material considerations including previous assessments of the site made by Dacorum Borough Council (DBC), including in the Dacorum Local Plan (2020-2038) Emerging Strategy for Growth (December 2020) and other relevant information. It concludes with an overall planning balance following the requirements of section 38(6) of the Planning and Compulsory Purchase Act 2004.

2.2 The proposal has been submitted by Ryan and May (‘the Agent’) on behalf of Harrow Estates (‘the Applicant’), who have promoted the land as an allocation for housing development through the local plan process. The site is included within the draft Local Plan, identified as Growth Area ‘Tr03’. The draft allocation proposes around 1,400 homes (including provision for older people), a new neighbourhood centre with sports/community hub, new primary and secondary schools and public open space. The emerging Local Plan is currently subject to further evidence testing in light of responses received to the last public consultation held between November 2020 and February 2021, and revisions to the strategy are being considered in light of this. The next consultation on the emerging Plan is scheduled for the summer of 2023.

Growth of Tring

2.3 The key issues raised by representations on the draft delivery strategy for Tring was that it proposed significant growth for the town. Whilst growth for the other market towns was relatively modest, the total population for Tring was expected to increase by circa 50% – significant opposition was recorded through the representations received.

2.4 The population of Tring was recorded at 11,635 in 2001, 11,713 in 2011 (circa +0.7%) (Settlements Profile Paper 2017) and was estimated at 12,464 in 2021 (as of 01.04.21) (estimation based on housing completions and average household size in the UK being 2.4 (ONS, 2020)) (circa +6.4%). It is noted that according to the housing completions data 313 dwellings have been constructed between 2011 and 2021.

2.5 A number of medium-sized housing schemes have contributed to this increase, including:

4/00129/10/VOT – Maud & Irvine, Brook Street – 38 units

4/00102/13/MFA – Rose & Crown Hotel, High Street – 35 units

4/03167/17/MFA – Convent of St Francis De Sales Preparatory School, Aylesbury Road – 31 units

2.6 In 2019, planning permission was granted for the construction of 226 dwellings including 90 affordable units on the western edge of Tring under local allocation 'LA5' – see Local Planning Authority (LPA) reference: 4/00958/18/MFA. This site, referred to as 'Land at Icknield Way' was allocated as part of the Core Strategy (2013) and subsequent Site Allocations Development Plan Document (DPD) (2017). At the time of writing this report the construction work for LA5 is nearing completion. Based on the average household size, the LA5 development will be increasing the population of Tring by circa 542 residents.

2.7 It is also worth noting that various schemes totalling 53 units are currently outstanding at the Akeman Business Park, Akeman Street. These are made up of the following applications: 4/01257/16/OPA, 4/02762/16/OPA, 4/02857/17/FUL, 4/00553/18/LPA and 4/01170/19/FUL.

2.8 The draft allocations for Tring (Tr01-05) suggest the construction of around 2,274 homes for the emerging Plan period, which would give rise to an approximate population increase of 5,457 based on the aforementioned average household size. Around 3,360 residents would be attributed to the proposed development.

2.9 It is worth noting that there are a number of other site allocations associated with Tring (Tr01-Tr05). These are listed within the 'Proposals and Sites' chapter of the emerging Plan. Two are particularly relevant to this application, Tr01 and Tr02, as they are sited within close proximity to the site and intrinsically linked in terms of broader infrastructure requirements and the emerging growth and delivery strategies. Tr02 is sited directly adjacent to the site, along the western boundary. It encompasses approximately 15ha of agricultural land and is identified as 'Tr02: New Mill'. The New Mill site is discussed later in the report.

Environmental Impact Assessment

2.10 The Applicant has submitted a voluntary Environmental Impact Assessment (EIA) of the proposed development, following the previous scoping opinion, which can be found under Local Planning Authority (LPA) reference: 21/04241/SCO.

Glossary

2.11 The following abbreviations are used in this report.

AAS – Area of Archaeological Significance

ALC – Agricultural Land Classification

AONB – Area of Outstanding Natural Beauty

ASHP – Air Source Heat Pumps

BMV – Best and Most Versatile (Agricultural Land)

BNG – Biodiversity Net Gain

BNGMP – Biodiversity Net Gain Management Plan

BPA – British Pipeline Agency

CBSAC – Chilterns Beechwoods Special Area of Conservation

CEMP – Construction and Environmental Management Plan

CRT – Canal and River Trust

DAS – Design and Access Statement

DBC – Dacorum Borough Council

Defra – Department for Environment, Food and Rural Affairs
DfE – Department for Education
DMRB – Design Manual for Roads and Bridges
DPD – Development Plan Document
ECP – Environmental and Community Protection
EEAST – East of England Ambulance Service
EES – Energy and Sustainability Strategy
EIA – Environmental Impact Assessment
FBS – Future Buildings Standard
FHS – Future Homes Standard
FIT – Fields in Trust
FRA – Flood Risk Assessment
FTP – Framework Travel Plan
GFRA – Grove Fields Residents Association
HCC – Hertfordshire County Council
HDA – Hankinson Duckett Associates
HMWT – Hertfordshire & Middlesex Wildlife Trust
HoTs – Heads of Terms (for the Section 106 Agreement)
HVCCG – Herts Valley Clinical Commissioning Group
HVCCG – Herts Valley Clinical Commissioning Group
ILP – Institute of Lighting Professionals
LAP – Local Area of Play
LDS – Local Development Scheme
LEAP – Locally Equipped Area of Plan
LEMP – Landscape and Ecological Management Plan
LPA – Local Planning Authority
LSE – Likely Significant Effects
LVIA – Landscape and Visual Impact Assessment
LWS – Local Wildlife Site
MUGA – Multi-Use Games Area
NEAP – Neighbourhood Equipped Area of Play
ONS – Office of National Statistics
OSSP – Open Space Standards Paper
PPG – Planning Practice Guidance
PV – Photovoltaic
RHG – Rothchild House Group
RHG – Rothschild House Group
RIHRA – Report to Inform the Habitat Regulations Assessment
S106 – Section 106 Agreement
SA – Sustainability Appraisal
SAC – Special Area of Conservation
SAMM – Strategic Access Management and Monitoring
SANG – Suitable Alternative Natural Greenspace
SBHC – Self-Build and Custom Housing
SDS – Sustainable Drainage Strategy
SEIS – Socio-Economic Impact Statement
SPAS – Sport and Physical Activity Strategy
SPD – Supplementary Planning Document
SPG – Supplementary Planning Guidance
SRMP – Soul Resource Management Plan
SSSI – Site of Special Scientific Interest
STS – Sustainable Transport Study
SuDS – Sustainable Drainage Systems
SWMP – Site Waste Management Plan
TA – Transport Assessment

3. SITE DESCRIPTION

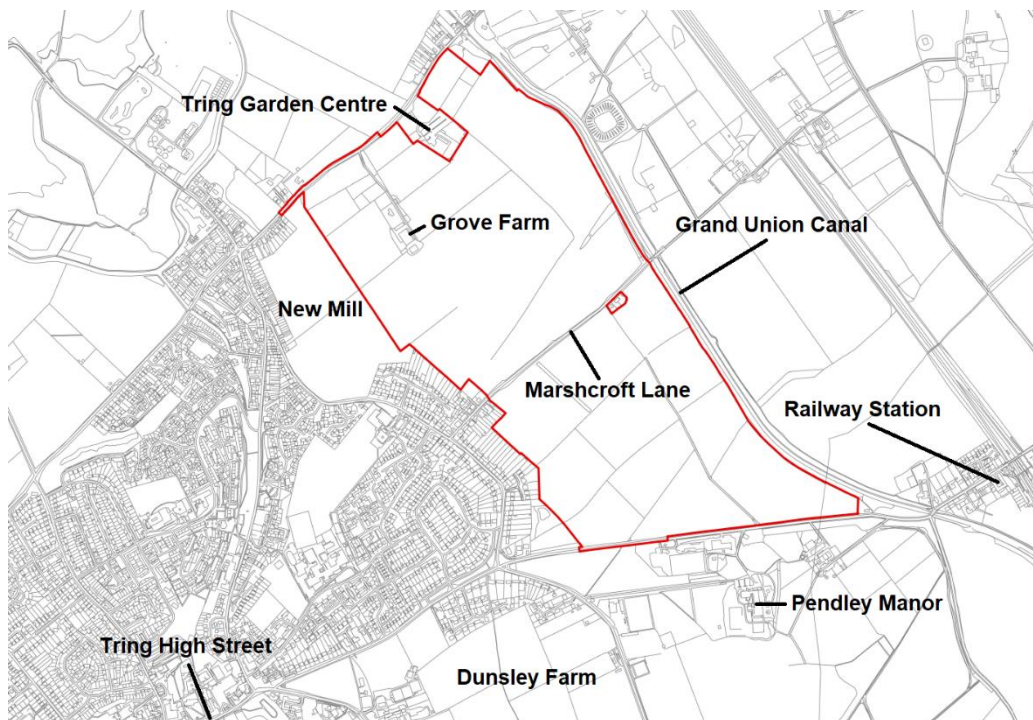
3.1 The application site, referred to as ‘Land East of Tring’, ‘Marshcroft’ or ‘Marshcroft Garden Suburb’ comprises an area of land circa 121 hectares to the east of Tring. It falls within Landscape Character Area 114 (Tring Gap Foothills), described in the Dacorum Landscape Character Assessment (2004) as a traditional landscape between the low lying Aylesbury Vale and the Chilterns.

3.2 The site comprises open agricultural and pastoral land, with a small number of farm buildings at the northern end. It has a relatively flat landform with a localised mound in the north-west, sloping down to the south-eastern extent of the site. There are no significant level differences across the site. A raised bank runs alongside the canal corridor, which is thought to have been created during the excavation of the Grand Union Canal. This creates a ‘lip’ on the eastern edge of the site. There is also a slight ridge where the current buildings of Grove Farm are located. The Canal is set down within a deep cutting and is not readily visible from the site due to existing vegetation.

3.3 Marshcroft Lane runs through the centre of the site but is excluded from the site boundaries. Also excluded are the residential properties on Marshcroft Lane, Tring Garden Centre (to the north-west of the site) and Ivy Cottage in the south-east corner.

3.4 The site is bounded by Bulbourne Road on the north-west and the Canal on the north-east. To the south of the site is Station Road, which has a number of buildings associated with Pendley Manor. To the south-west of the site lies the settlement of Tring. The site has a rural character with hedgerows running through and tree planting on the north-east and southern periphery. Other treed areas exist around and within the site.

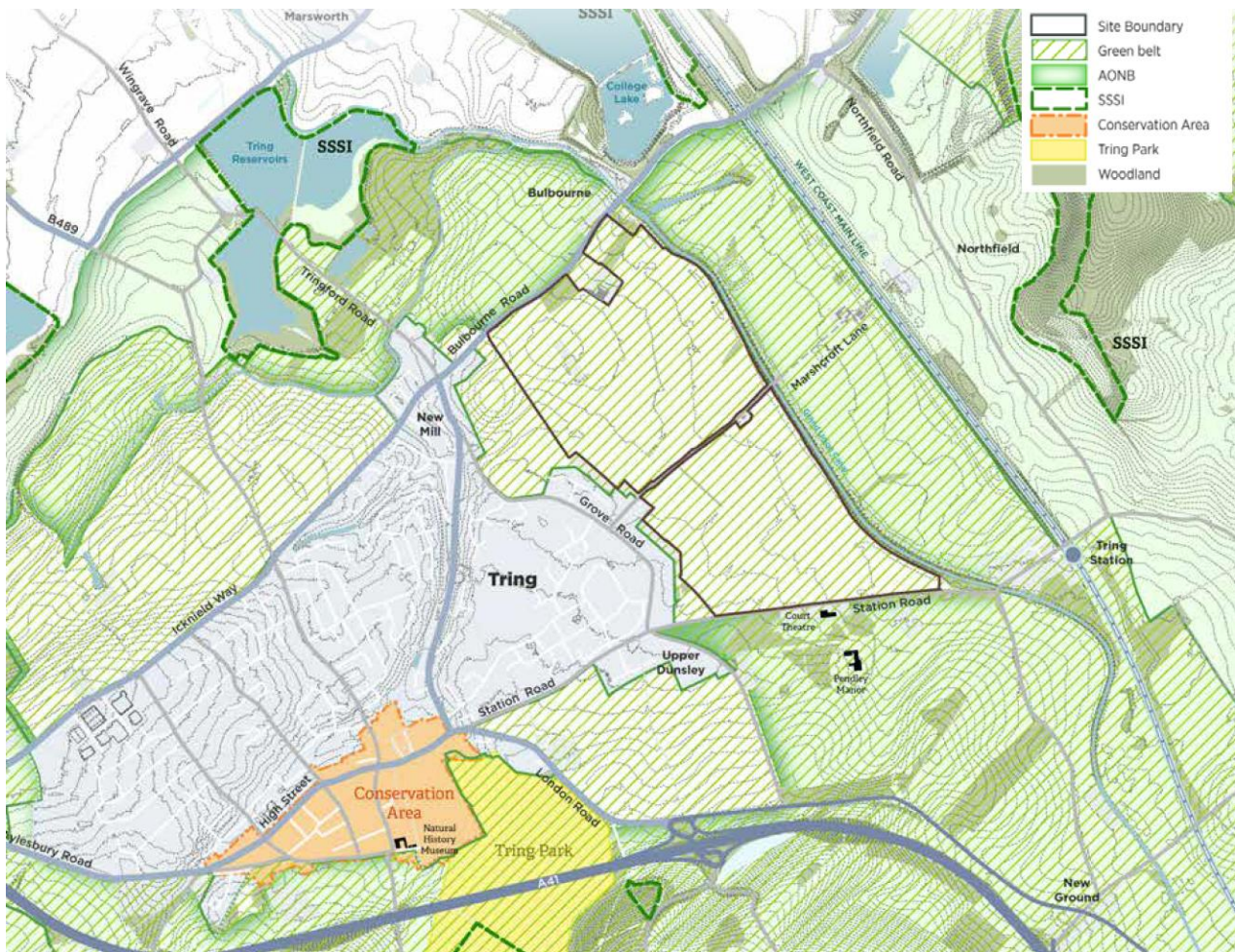
Figure 1 – Context Map



3.5 In terms of planning designations and constraints, the entire site lies within the Metropolitan Green Belt and the Chilterns Area of Outstanding Natural Beauty (AONB) borders the northern, eastern and southern boundaries of the site.

3.6 Regarding heritage assets, part of the site lies within an Area of Archaeological Significance (AAS). There are no nationally designated buildings or conservation within the site boundary. However, 29 listed buildings are within one kilometre of the site. Most importantly, to the south of Station Road are a number of buildings associated with Pendley Manor, a grade II listed building. The application site is situated adjacent to the Grand Union Canal and two Local Wildlife Sites (LWS). There is a high-pressure petroleum pipeline that runs through the site.

Figure 2 - Topography and Landscape Character



3.7 Of specific relevance, the site is situated within relatively close proximity to the Chilterns Beechwoods Special Area of Conservation (Beechwoods SAC), which includes the Ashridge Estate managed by the National Trust. DBC are legally required through the Habitats Regulations Assessment to ensure the integrity of the SAC is not adversely affected by new planning proposals. Natural England have advised the council that a mitigation strategy is needed to set out the actions necessary to protect the SAC from recreational pressure.

3.8 There are a number of residential properties on Marshcroft Lane that have been excluded from the site boundaries. Tring Garden Centre has also been 'cut out' of the north-western boundary. Tring Train Station is located on Station Road, around 450 metres from the eastern boundary of the site. Rail services north and south provide important connections to various destinations including Birmingham and London.

4. PROPOSAL

4.1 The proposals comprise up to 1,400 dwellings including affordable, elderly persons' accommodation, first homes and self/custom-build. The proposals also include new vehicular and pedestrian/cycle routes, a local centre with retail, health, community and work spaces, a sports/community hub, allotments and orchards, a primary and secondary school and areas of open space and suitable alternative natural green space (SANG).

4.2 The application is an outline application with all matters reserved except access. Vehicular access points are proposed to both Bulbourne Road and Station Road, connected by a link road running north-south through the site, as required by the draft allocation.

Quantum of Development

4.3 The planning application is for a mixed-use development and, as such, proposes a range of other uses on top of the residential provision. Core Strategy Policy CS23 – Social Infrastructure encourages the provision of new services and facilities for the community to be located to aid accessibility and allow different activities. The policy specifies that larger developments may include land and buildings to provide social infrastructure as well as making contributions as part of planning obligations where necessary.

4.4 The emerging Plan states that the Tr03 allocation would be capable of accommodating around 1,400 new homes, as well as a new neighbourhood centre, sports/community hub, primary school and secondary school.

4.5 Table 2.1 of the Sport and Physical Activity Strategy (Revision B) provides a useful breakdown of the proposed built development, quantum of development and use classes, which has been reproduced below. Please note that this was updated during the course of the application and is therefore different to various other documents, for example, the Planning Statement.

Table 1 – Quantum of Development and Use Class

Built Development	Quantum	Use Class
Dwellings Including: Market Housing Affordable Housing Self-Build / Custom Build	Up to 1,400 units	C3
Older Persons Housing Including: Extra Care Housing Nursing Home	Up to 140 units (within the overall total of 1,400 dwellings)	C2
Shops and Services	Built floorspace of up to 1,000sq.m	E
Wine Bar, Pub and Takeaway	Up to 250sq.m	Sui Generis
Sports Hub Including: Indoor Sports and Recreation	A building of up to 1,600sq.m	E (Indoor) F2

Facilities Outdoor Sports Facilities		
Health Facility	A building of up to 1,000sq.m	E
Primary School	2 Form Entry	F.1
Secondary School	6 Form Entry + Sixth Form	F.1
Community Building(s) For use as Public Hall or Worship and Incorporating Changing and Sports Pavilion Facilities	Up to 405sq.m plus 150sq.m addition for clubhouse	F.1

4.6 The application would provide a mixed use, residential led development with an appropriate mixture of facilities. Officers are satisfied that the proposed quantum has been robustly evidenced and justified through a suite of technical documents that support the application.

Timing and Phasing

4.7 Section 20 of the submitted Planning Statement (Document 7) and the Draft Phasing Plan (Document 5b) highlight the illustrative phasing and timescales of the proposed development. They identify that various elements of the scheme would need to be brought forward at different times depending on the existing needs of Tring and the new population generated by the number of houses built.

4.8 It appears that the commencement of works including the SANG are proposed to begin in 2023 with the main accesses and spine road being constructed in 2024. The Agent has clarified that the first residential occupation of 155 units, referred to as 'Housing A' would tie in with the completion of the SANG and sustainable drainage systems (SuDS) in 2025. Between 2026 and 2033 the remaining housing would be constructed, with larger numbers of units being occupied in the latter stages (circa 310 units (B and C) in 2025-27, 310 units (D and E) in 2028-29 and the remaining 625 units (F and I) in 2028-2033).

4.9 It should be noted that the majority of social/community buildings are proposed to be constructed between 2026 and 2029 including the schools, community building, sports hub and health facility. Most of the open space, landscape and off-site infrastructure works are also proposed during this period.

4.10 The aforementioned documents and specifically Table 20.2 of the Planning Statement describes the proposed timescales and phasing in more detail.

4.11 The proposed indicative phasing and proposed legal triggers (i.e. to provide X contribution at the occupation of X number of dwellings) appears appropriate in terms of the on-site delivery. These would become more accurate and finalised at reserved matters stage. However, there are a number of wider infrastructure considerations such as education, which have not been fully resolved due to the progress of the emerging Plan, and specifically the emerging strategy for growth in Tring.

5. PLANNING HISTORY

Background

5.1 Harrow Estates purchased the land lying between Station Road and Marshcroft Lane in 2013 (the 'southern parcel'). The company subsequently promoted the land as an allocation for housing development through the local plan process.

5.2 In early 2017, they entered into a joint promotion agreement for the remainder of the land within the application site, creating an overall site, which also included the land between Marshcroft Lane and Bulbourne Road (the 'northern parcel'), of c.121ha.

Pre-Applications

Dates: Validated 22nd October 2021, Reply Sent 20th January 2022

LPA Reference: 21/04044/PREA

Description: Outline planning permission for around 1,400 dwellings (including 40% affordable dwellings); a new local centre and sports/community hub; a primary school; a secondary school; and public open space. All matters, save access, to be reserved.

Summary: The pre-application advice acknowledged that a number of issues e.g. ecology, archaeology, flooding, drainage and highway safety could be addressed through suitable mitigation in-line with consultation with relevant consultees. However, a number of outstanding concerns remained including the impacts on the Green Belt designation and adjacent AONB.

The proposal was considered inappropriate development, which is, by definition, harmful to the Green Belt and would not be approved except in very special circumstances (VSCs). It was explained that VSCs will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. It was therefore concluded that the onus is on the Applicant to put forward an argument in this regard.

Environmental Impact Assessment – Scoping Opinion

Dates: Validated 2nd November 2021, Reply Sent – 8th December 2021

LPA Reference: 21/04241/SCO

Description: Development comprising 1,400 dwellings, a new local centre and sports/community hub; a primary school; a secondary school; and public open space and associated infrastructure.

Summary: The report explained the views of the local planning authority in terms of the scope of the Applicant's Environmental Statement, including types of environmental effect, mitigation measures, cumulative effects and types of projects.

Public Consultation

5.3 The Applicant carried out a number of public consultation activities, including: sending brochures and letters to politicians and stakeholders to raise awareness and invite them to consultation events; hosting exhibitions and public consultation events; creating a website; undertaking a community review panel (response from panel can be found in Appendix C) and a number of design code workshops; and undertaking a number of calls and meetings with relevant consultees and residents. The consultation took place between October 2021 and February 2022 (see timeline in Table 12.1 of the Planning Statement).

5.4 During the course of the public consultation exercise the scheme evolved. The most notable change was that the proposed layout merged from two 'village centres' (north and south) into one central core. Full details of the consultation exercises and the changes that were made can be found within the Applicant's Statement of Community Engagement (Document 13) and other associated documents.

Current Application

5.6 The current application was validated by DBC on the 13th April 2022. The application was subsequently extended twice during the determination period to address outstanding matters. The extensions of time were agreed by both parties.

6. CONSTRAINTS

Area of Archaeological Significance: 6
Adjacent to the Chilterns Area of Outstanding Natural Beauty
Article 4 Directions: Land by Marshcroft Farm, Bulbourne Road, Tring
British Waterways (25m Buffer) – North: 25m buffer
British Waterways (25m Buffer) – South: 25m buffer
Canal Buffer Zone: Minor
Former Land Use (Risk Zone)
Green Belt
Oil Pipe Buffer: 100
RAF Halton and Chenies Zone: Green (15.2m)
RAF Halton and Chenies Zone: RAF HALTON: DOTTED BLACK ZONE
Residential Area (Town/Village): Residential Area in Town Village (Tring)
Adjacent to Residential Character Areas: TCA12, TCA17 and TCA19
Wildlife Sites: Grand Union Canal, Bulbourne to Tring Station

7. REPRESENTATIONS

Consultation responses

7.1 These are reproduced in full at Appendix A.

7.2 The LPA has consulted the following statutory and non-statutory consultees on this planning application. Their responses have helped to shape the proposal and inform the recommendation.

Affinity Water - Three Valleys Water PLC
British Gas
British Pipeline Agency
British Telecommunications PLC
Cadent Gas Limited
Canal & River Trust
Chilterns Conservation Board
Civil Aviation Authority
Community Partnerships and Wellbeing (DBC)
Conservation & Design (DBC)
Countryside & Rights of Way (HCC)
Crime Prevention Design Advisor (HCC)
East of England Ambulance Service
EDF Energy
Education (HCC)
Environment Agency - East Anglia Team
Environmental and Community Protection (DBC)

Fire Hydrants (HCC)
Forestry Commission
Hazardous Substances (HSE)
Health & Safety Executive
Hertfordshire Building Control
Hertfordshire Ecology
Hertfordshire Fire & Rescue (HCC)
Hertfordshire Gardens Trust
Hertfordshire Highways (HCC)
Hertfordshire Property Services (HCC)
Herts & Middlesex Badger Group
Herts & Middlesex Wildlife Trust
Herts Valleys CCG
Highways England
Historic Buildings & Places
Historic England
Historic Environment (HCC)
Land & Movement Planning Unit (HCC)
Lead Local Flood Authority (HCC)
Lighting Expert (DBC)
National Air Traffic Services
National Amenity Societies
Natural England
Network Rail
Parks & Open Spaces (DBC)
Planning Liaison Officer
Public Health (HCC)
Ramblers Association
Rights Of Way (DBC)
Royal Society for the Protection of Birds
Secretary Of State
Society for the Protection of Ancient Buildings
Southern Gas Network
Spatial Planning Unit (HCC)
Sport England
Strategic Planning & Regeneration (DBC)
Sustainability (HCC)
Thames Water
The Chiltern Society
The Council for British Archaeology
The Countryside Charity
The Gardens Trust
The Georgian Group
The National Trust
The Victorian Society
Trees & Woodlands
Tring Town Council
Twentieth Century Society
UK Power Networks
Urban Design (DBC)
Valuation & Estates Unit (DBC)
Waste Services (DBC)

7.3 The consultation responses are reproduced in full at Appendix A.

Neighbour notification/site notice responses

7.4 The LPA has undertaken a formal public consultation as prescribed in Article 15 of the Development Management Procedure Order (as amended) and the council's Statement of Community Involvement (2019). Letters were sent to 286 residences and four site notices were erected around the site on 12th May 2022.

7.5 The neighbour responses are reproduced in full at Appendix B.

Applicant's public consultation

7.6 Where proposals are large scale and likely to impact on an area, the Council's Statement of Community Involvement encourages applicants to engage directly with the local community prior to the submission of a planning application. The application has been subject to pre-application discussions and public consultation formed part of the pre-application process. Officers and members from DBC also engaged with the public consultation process. A summary of the main issues raised at the public consultation events, together with the applicant's responses, are set out within the Applicant's Statement of Community Engagement.

8. KEY DOCUMENTS AND PLANNING POLICIES

Main Documents:

National Planning Policy Framework (2021)
Dacorum Borough Core Strategy 2006-2031 (adopted September 2013)
Dacorum Borough Local Plan 1999-2011 (adopted April 2004)

Relevant Policies:

Dacorum Borough Core Strategy

NP1 – Supporting Development
CS1 – Distribution of Development
CS2 – Selection of Development Sites
CS3 – Managing Selected Development Sites
CS4 – The Towns and Large Villages
CS5 – Green Belt
CS8 – Sustainable Transport
CS9 – Management of Roads
CS10 – Quality of Settlement Design
CS11 – Quality of Neighbourhood Design
CS12 – Quality of Site Design
CS13 – Quality of Public Realm
CS14 – Economic Development
CS16 – Shops and Commerce
CS17 – New Housing
CS18 – Mix of Housing
CS19 – Affordable Housing
CS23 – Social Infrastructure
CS24 – The Chilterns Area of Outstanding Natural Beauty
CS25 – Landscape Character
CS26 – Green Infrastructure
CS27 – Quality of the Historic Environment
CS28 – Carbon Emission Reductions
CS29 – Sustainable Design and Construction

CS31 – Water Management
CS32 – Air, Soil and Water Quality
CS35 – Infrastructure and Developer Contributions

Dacorum Borough Local Plan (DBLP) (Saved Policies)

Policy 18 – Size of New Dwellings
Policy 21 – Density of Residential Development
Policy 37 – Environmental Improvements
Policy 51 – Development and Transport Impacts
Policy 57 – Provision and Management of Parking
Policy 58 – Private Parking Provision
Policy 62 – Cyclists
Policy 76 – Leisure Space in New Residential Development
Policy 77 – Allotments
Policy 79 – Footpath Network
Policy 80 – Bridleway Network
Policy 97 – Chilterns Area of Outstanding Natural Beauty
Policy 99 – Preservation of Trees, Hedgerows and Woodlands
Policy 101 – Tree and Woodland Management
Policy 102 – Sites of Importance to Nature Conservation
Policy 103 – Management of Sites of Nature Conservation Importance
Policy 106 – The Canalside Environment
Policy 108 – High Quality Agricultural Land
Policy 111 – Height of Buildings
Policy 113 – Exterior Lighting
Policy 118 – Important Archaeological Remains
Policy 119 – Development Affecting Listed Buildings
Policy 120 – Development in Conservation Areas
Policy 129 – Storage and Recycling of Waste on Development Sites
Appendix 1 – Sustainability Checklist
Appendix 3 – Layout and Design of Residential Areas
Appendix 8 – Exterior Lighting

Supplementary Planning Guidance/Documents (SPG/SPD) and Other Relevant Information

Chilterns Building Design Guide – Chilterns Flint Technical Note (2003)
Character Areas – Area Based Policies (2004)
Landscape Character Assessment (2004)
Environmental Guidelines (2004)
Chilterns Building Design Guide – Chilterns Brick Technical Note (2006)
Chilterns Building Design Guide – Roofing Materials Technical Note (2007)
Strategic Housing Market Assessment (2008)
Manual for Streets (2010)
Chilterns Buildings Design Guide (2010)
Dacorum Urban Design Assessment Tring (2010)
Planning Obligations (2011)
Roads in Hertfordshire, Highway Design Guide 3rd Edition (2011)
Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice (2011)
Affordable Housing (2013)
Refuse Storage Guidance Note (2015)
Sustainable Development Advice Note (2016)
Strategic Housing Market Assessment (2016)
Settlements Profiles Paper (2017)
Conservation of Habitats and Species Regulations (2017)

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning (2017)
 Garden City Standards for the 21st Century: Practical Guides (2017 – 2021)
 Tring Conservation Area Appraisal (2018)
 Affordable Housing Clarification Note (2019)
 Open Space Study – Standards Paper (2019)
 Chilterns Area of Outstanding Natural Beauty Management Plan (2019 – 2024)
 Car Parking Standards (2020)
 South West Hertfordshire Local Housing Needs Assessment (2020)
 Building for a Healthy Life (2020)
 AECOM Site Assessment Study (2020)
 Interim Sustainability Appraisal Report (2020)
 Dacorum Landscape Sensitivity Study (2020)
 Dacorum Local Plan Consultation Summary Report (2021)
 Authority Monitoring Report 2019/20 (2021)
 Housing Delivery Test Action Plan (2021)
 Dacorum Strategic Design Guide (2021)
 National Model Design Code (2021)
 National Design Guide (2021)
 Visitor Survey, Recreation Impact Assessment and Mitigation Requirements for the Chilterns
 Beechwoods SAC and the Dacorum Local Plan (2022)

9. CONSIDERATIONS

Main Issues

9.1 There are a number of key considerations that are relevant to this application. These include:

- Policy context and principle of development;
- Green Belt harm;
- Landscape and visual impacts;
- Chilterns Beechwoods Special Area of Conservation;
- Housing delivery;
- Density of residential development;
- Quality of design;
- Environmental implications including air quality, noise and vibration, loss of agricultural land, ecology and biodiversity and trees/vegetation, flood risk and drainage, lighting and contamination.
- Residential amenity;
- Healthy communities including open space, play provision, sports facilities and food growing;
- Community facilities including education, health and other buildings;
- Socio-economic impacts;
- Climate change and sustainability;
- Heritage, archaeology and conservation;
- Connectivity, highway implications and parking provision;
- Other material planning considerations including utilities, oil pipeline, public consultation responses, planning obligations and community infrastructure levy;
- Any other harm; and
- The case for very special circumstances.

Policy Context and Principle of Development

9.2 DBC, in line with the National Planning Policy Framework (2021) (henceforth referred to as the 'Framework') has adopted an "open for business" approach to new development in order to secure

sustainable economic growth by proactively supporting sustainable economic development to deliver homes, business and infrastructure with particular emphasis on high quality design.

9.3 The Green Belt, in which the East of Tring development is located, is key to Government policy. It aims to prevent urban sprawl by keeping land permanently open, protect its character, local distinctiveness and the physical separation of settlements. DBC's Core Strategy, adopted in 2013, states that the council will apply the Government's national Green Belt policy (see Policy CS5).

9.4 For this application Paragraphs 147 to 151 of the Framework ("Proposals affecting the Green Belt") are most important for considering the principle of development. Paragraph 149 states that LPAs should start from the premise that the construction of new buildings in the Green Belt is inappropriate. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Although the Framework allows for a number of exceptions (see Appendix D), they are not considered to apply to the current proposal. Therefore, the proposals would constitute inappropriate development in the Green Belt contrary to both national and local policy.

9.5 The site was identified in the council's emerging Local Plan (the 'emerging Plan') (Regulation 18 stage) as a preferred location for a housing-led mixed-use development (see Tr03). The selection of sites for allocation in the emerging Plan is complex and underpinned by a number of evidence studies which has informed officers' recommendations on draft site allocations.

9.6 In July 2021, the council's cabinet raised significant objections to many core proposals in the draft emerging Plan, including the overall Spatial Strategy, the proposed Delivery Strategy for Tring, and the proposed allocation Tr03: East of Tring. As such, the cabinet deferred further progress of the Plan to allow additional time for evidence to be gathered.

9.7 It is likely that going forward there will be an increased emphasis on brownfield sites within Hemel Hempstead to provide larger amounts of housing to reduce pressure on the Green Belt. At present, and until the emerging Plan is finalised, the site remains unallocated and subject to Green Belt designation. Regarding timescales, a Local Development Scheme (LDS) was approved in February 2022; highlighting that the adoption of the Plan is now scheduled for October 2025.

9.8 Having regard to paragraph 48 of the Framework, which indicates that LPAs may give weight to relevant policies in emerging plans according to a set of criteria, it is considered that only very limited weight can be afforded to the site's inclusion in the emerging Plan. This is primarily due to the stage of preparation of the emerging Plan, the extent of the unresolved objections to strategic policies at this time, the prematurity of this application and the fact that the proposal does not wholly align with the emerging delivery strategy for Tring, including the need for comprehensive development with other draft allocations to the west and south.

9.9 Taking the above into account, the proposal taken as a whole needs to demonstrate 'very special circumstances' sufficient enough to justify the principle of development in this location. Paragraph 148 makes clear that 'very special circumstances' (VSCs) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. This will be explored in detail later in the report.

Planning Policy Note – Emerging Plan

9.10 Whilst it is acknowledged that there are a range of draft policies within the emerging Plan, which have been discussed in detail in the Applicant's documents, they are considered to have little weight due to the current stage of the emerging Plan and because of their un-adopted nature.

Some of the draft policies are mentioned in this report, however, the full range of policies, whilst considered, are not discussed in detail.

Green Belt Harm

9.11 The Framework is clear that inappropriate development is, by definition, harmful and should not be approved except in very special circumstances.

9.12 Case law has established that, following confirmation that the proposed development is 'inappropriate development' (i.e. development not identified at Paragraphs 149 and 150 of the Framework), then whether there is 'any other harm' to Green Belt must be established through an assessment of:

1. The performance of the Green Belt in question, having regard to the five purposes of the Green Belt identified at NPPF Paragraph 134;
2. The harm to the openness of the particular area of Green Belt as a result of existing development; and
3. The direct harm caused by the proposed development (i.e. new buildings).

9.13 Once the level of harm is quantified, the extent of 'other considerations' necessary to overcome that harm can be established. Reference to 'any other harm' should be taken to mean non Green Belt harm (e.g. highways, ecology, etc.).

1. Performance of Green Belt:

9.14 The Applicant's Planning Statement (paragraphs 17.9-17.9.5) acknowledges that the development is inappropriate in the Green Belt, resulting in a loss of openness and encroachment to the countryside. No impact on the setting and special character of historic towns is identified.

9.15 In 2013, a Green Belt Review Purposes Assessment was carried out for DBC on behalf of SKM, identifying Zone GB04 in which the Land East of Tring formed part of, as significantly contributing towards preventing merging (providing a strategic gap between Tring and Berkhamsted) and safeguarding the countryside.

9.16 As the majority of the site is open agricultural land, it is considered that the entire site constitutes open countryside. It follows, therefore, that the application site is sensitive and effective in safeguarding the countryside from encroachment as highlighted in the Green Belt Review.

9.17 A further 'Stage 2' assessment was carried out in 2016 (see Green Belt Appraisal Report 2016 by ARUP) to look at smaller 'sub-parcels' in more detail. The Land East of Tring site was split into parcels TR-A2 and TR-A3. It was concluded that the parcels do not provide a gap between any settlements and therefore make no discernible contribution to separation. However, both parcels ranked highest in terms of purpose 3 i.e. to assist in safeguarding the countryside from encroachment.

9.18 In relation to Purpose 1 (prevent the unrestricted sprawl), TR-A2 was rated 3 out of 5. The score highlights that the area is connected to a large built-up area, though the large built-up area is predominantly bordered by prominent, permanent and consistent boundary features. TR-A3 was considered to score 3+ out of 5 i.e. connected to a large built-up area predominantly bordered by features lacking in durability or permanence.

2. Existing Openness

9.19 In terms of openness, there are open views of the site from the footpath (numbers 057 and 058), which runs parallel to the Grand Union Canal on the eastern edge of the site. Views into the site from the roads to the north, south and centre (Marshcroft Lane) are somewhat circumscribed by existing hedgerows and trees. There are views into the site from adjacent properties. Middle distance views are relatively limited, however there are several public rights of way (including the Ridgeway National Trail) located on the high ground of the Chilterns escarpment, which afford distant open views of the site. The landscape and visual impact assessment review undertaken by Hankinson Duckett Associates (and discussed in more detail in the next section) highlights that the site is sensitive to views from footpaths.

3. Proposed Development

9.20 As set out within the baseline of the LVIA, the existing settlement of Tring is well integrated into the landscape. The proposed green infrastructure would help soften development, particularly the proposed green corridors/wedges that would extend from the SANG on the eastern edge, which would give the development a degree of permeability. However, the proposed development is of a significant scale, resulting in a quantum of built development would appear as a prominent new feature from a number of public vantage points including the Chilterns Hill escarpment and Ridgeway National Trail.

9.21 When considering the existing site (primarily empty) and proposed footprint and volume of development, and the visibility from within and outside of the site, the proposal is considered to significantly reduce openness.

9.22 Taking the areas of assessment above into account, it is considered that the development would result in very substantial harm to the Green Belt in terms the definitional harm as per paragraph 147 of the Framework and encroachment into the countryside.

9.23 In determining the level of harm to the countryside, it is important to note that not all countryside is the same. In this case, and acknowledged in the various green belt reviews/assessments, the application site is considered 'open countryside' and therefore would result in a substantial level of harm in this respect. The overall harm to the Green Belt is afforded very substantial weight.

9.24 National planning policy directs that '*substantial weight is given to any harm to the Green Belt*'. The 'other harm' associated with the proposals will be discussed throughout this report and summarised at the end.

Landscape and Visual Impacts

9.25 A Landscape and Visual Assessment (LVIA) have been submitted, details of which are found in the Environmental Statement (Chapter 8) and associated Appendices: D.1 (Figure 8.3 – Landscape Character Plan and 8.7 Figure Night-Time Light Sources Plan); D.2 (LVIA Methodology); D.7 (Landscape and Visual Effects Tables); and the Framework Construction Environmental Management Plan (Document 6i) (Chapter 6).

9.26 The documents above describe the landscape of the site and surrounding area, and the impacts of the development on the landscape including its appearance at night.

9.27 As part of the following assessment, DBC commissioned and independent review of landscape impacts, which was undertaken by Hankinson Duckett Associates (HDA).

Planning Policies

9.28 There are a number of planning policies and documents that are relevant to an assessment of the landscape and visual impacts.

9.29 The Framework, paragraphs 174 and 176, recognise the intrinsic character and beauty of the countryside and ensure that planning decisions protect and enhance valued landscapes. Great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.

9.30 Policy CS10 requires, at the broad settlement level, development to respect the landscape character surrounding settlements. Policy CS24 ensures that the special qualities of the Chilterns AONB are conserved and that regard is given to the policies and actions set out in the Chilterns Conservation Board's Management Plan. Policy CS25 ensures that Dacorum's natural and historic landscape is conserved. Proposals will be assessed for their impact on landscape features to ensure that they conserve or improve the prevailing landscape quality, character and condition.

9.31 Saved Policy 97 states that any development that in the AONB, the prime planning consideration will be the conservation of the beauty of the area. Any proposal that would seriously detract from this will be refused.

9.32 There are also a number of notable documents relevant to the assessment of landscape and visual impacts on this site, including Dacorum's Landscape Character Assessment (2004) and Landscape Sensitivity Study (2020).

9.33 Planning Practice Guidance for 'Natural Environment – Landscape' (July 2019) states that in considering development proposals that are situated outside of AONB boundaries, but which might have an impact on their setting, relevant authorities shall have regard to the purposes for which these areas are designated.

Assessment

9.34 The site retains a generally rural and highly open character, and has a strong relationship with the countryside beyond, as opposed to the settlement. The site is bounded by the AONB on its northern, eastern and southern boundaries. The site also lies within the 'Tring Gap Foothills' i.e. Area 114 of the Landscape Character Assessment.

9.35 In terms of visibility, there are open views of the site from the footpath (numbers 057 and 058), that runs parallel to the Grand Union Canal on the eastern edge of the site. Views into the site from the roads to the north, south and centre (Marshcroft Lane) are heavily filtered by existing hedgerows and trees. There are views into the site from adjacent properties. Middle distance views are relatively limited, however there are several public rights of way (including the Ridgeway National Trail) located on the high ground of the Chilterns escarpment, which afford distant open views of the site.

9.36 The submitted LVIA sets out a baseline situation in terms of landscape character, features and existing visibility. It then identifies opportunities and constraints and explains how these have informed the design of the proposed development. The likely landscape and visual effects during construction and operation phases follow.

Construction Phase

9.37 The LVIA confirms that there would be inevitable effects on the landscape during the construction phase of the development, which would take approximately ten years. Regarding landscape effects, the Assessment highlights three receptors that would be likely to experience significant effects, including agricultural fields, waterbodies and the character of the site and its immediate surroundings.

9.38 Turning to visual effects, nine visual receptors were considered likely to experience significant effects, including residents of properties on the north-eastern edge of Tring, pedestrians on the canal, pedestrians on Marshcroft Lane and a number of other public vantage points e.g. the Ridgeway on Pitstone Hill and various other public footpaths.

9.39 In terms of night-time effects, it is highlighted that construction works would be primarily restricted to standard working hours with lighting occurring in the mornings and evenings in the winter. Overall, the effects ranged from minor adverse to moderate adverse effects.

Operational Phase

9.40 Turning to the operational phase of development, the LVIA explains that by year one of operation, the agricultural fields would be subject to moderate to major adverse landscape effects as a result of the completion of development. However, the remaining receptors were mainly identified as experiencing minor or negligible adverse effects, primarily due to the retention of hedgerows and the proposed planting and proposed waterbodies.

9.41 Following completion of the development, the LVIA reports that two visual receptors would experience significant effects, with the majority of surrounding footpaths/rights of way being considered minor adverse.

9.42 Similar to the construction phase, the night-time effects range from moderate adverse to minor adverse effects. However, as noted in the response from HDA, they are of the opinion that the potential night-time effects are underplayed and the new housing and in particular any need floodlighting would be noticeable, bringing light sources closer to the AONB. This is discussed in more detail in the 'Lighting' section.

9.43 The LVIA concludes that at year 15 (post-development), following the establishment of proposed planting, no significant adverse effects would remain for any visual receptors in relation to landscape or visual impacts.

Mitigation Measures

9.44 The proposal includes a number of mitigation measures that have been embedded through design and further measures that would be implemented through the Framework Construction and Environmental Management Plan (CEMP). These include:

- Setting back of development from eastern Site boundary to create a substantial area of open space along the canal corridor;
- Reinforcement of proposed defensible Green Belt boundary by the provision of a comprehensive landscape strategy within the SANG along the eastern boundary;
- Enhancement of green infrastructure connections;
- Creation of strategic open space;
- Retention of existing vegetation along site boundaries providing enclosure;
- Retention of vegetation and enhancement of green infrastructure network along the southern boundary of the site to minimise the impact upon the heritage setting of Pendley Manor;
- Consideration of height and scale of development to ensure sensitivity to the surrounding landscape;
- Creation of a Landscape Management and Biodiversity Strategy (Document 29) in order to ensure successful establishment of proposed hard and soft landscape features and areas; and
- Use of exterior lighting standards to minimise light spill.

Residual and Cumulative Effects

9.45 The LVIA concludes that whilst the proposed development would result in some significant adverse landscape and visual effects, the majority of these will be experienced during the construction phase, with the level of adverse effect significance generally diminishing as the landscape proposals are completed and planting begins to become established. No significant (i.e. major or moderate) adverse residual effects are identified following establishment of the planting.

9.46 Regarding lighting, the presence of additional lighting associated with the proposed development, including floodlighting and any street lighting required, is expected to lead to effects that are considered significant for one night-time receptor. However, as mentioned above, concerns have been raised in this regard and therefore suitable mitigation would be required in this respect.

9.47 The LVIA states that of the two cumulative developments that were identified, none produced significant adverse cumulative landscape, visual or night-time effects.

HDA Review

9.48 HDA have reviewed the LVIA on behalf of DBC and note that the baseline situation is accurately described. However, they judged that there were several discrepancies, for example, Dacorum's Landscape Sensitivity Study judged the site to be have neighbourhood landscape value and a 'Moderate High' susceptibility to change (see parcel reference 124), whereas the Applicant's LVIA assessed the overall sensitivity as 'Medium'. HDA also considered that the LVIA underplayed the visual effects from the footpaths on the Chilterns escarpment.

9.49 The residual effects would be reduced, however, HDA noted that the wireframes provided demonstrate that the proposals would remain visible and would not be reduced to the level of Neutral or Negligible effects as recorded in the LVIA.

9.50 HDA concluded that the proposals would adversely affect the experiential qualities and visual experience of the AONB, which would harm the setting to the AONB.

9.51 Whilst HDA noted that *'the general principle of landscape design is well thought through'* and that the SANG is appropriately located, concern was raised in relation to views into and out of the AONB. Recommendations were put forward to minimise the effects on the setting of the AONB, including:

- A stronger landscape structure within the development area, particularly in a north-south alignment;
- Additional structural tree planting;
- Inclusion of retained trees and woodland areas on parameter plans;
- Naturalistic designs for the SuDs basins; and
- Limit external lighting.

9.52 It is considered that additional structural tree planting would be of considerable importance to providing a development that would satisfactorily integrate into the landscape, overtime. It is noted that when the existing settlement of Tring is viewed from the AONB, the later suburban developments comprising the Grove Road/Grove Park area have successfully integrated into the landscape due to a large number of structural trees/high level of structural planting. There is also a strong tree-lined corridor along the linear park at Brook Street/Wingrave Road. As such, when viewing Tring from the Chilterns escarpment, the core settlement is visible in the distance,

whereas the later heavily planted developments moving towards the AONB are considerably softened/screened. It is considered that the proposed development would need to follow suit to enable a satisfactory residual impact.

9.53 The Design Code specifies mandatory design principles for streets within the development. It explains that the majority of streets have the capability to provide trees. However, limits are set for the width of verges. For the streets that have verges, limits are set at 2.5 metres. It also appears that buildings could be located within close proximity to the proposed verges. The Highway Authority at Hertfordshire County Council (HCC) were contacted regarding specifications for trees and they highlighted that:

Planting design should take account of longer-term maintenance, management, nature of the road corridor that this is intended for, including operational as well as safety requirements with:

- *Shrubs used in edge planting not to be planted within 0.5m from the edge of the carriageway.*
- *Medium size trees (tree girth less than 450mm) and pollards (such as Platanus, Tilia etc.) no closer than 1m.*
- *Larger, un-pollarded trees (tree girth greater than 600mm) not within 2m unless otherwise agreed by HCC.*

The minimum clearance to tree branches that overhang any pedestrian or cycle facility shall be 2.4m. Therefore, where possible trees should be crown lifted to 3m to minimise the need for excessive routine maintenance due to re-growth of branches, or any sag from the weight of the foliage.

The clearance distance to tree branches that overhang the trafficked carriageway shall be 5.6m minimum, with the crown lifted to 6m.

9.54 The Trees and Woodlands Department at DBC were also contacted regarding the feasibility of structural planting within the streets of the development. They highlighted that on the illustrative street that show buildings sections (see Design Code, pages 78-83), the sections would represent medium-sized trees such as whitebeams, hawthorns, cherries or birch. They explained that the proposed London plane and fastigiata hornbeam trees can be considerably sized trees on maturity but should only be considered where there is sufficient space. The proposed 2.5 metres verges were not considered sufficient to accommodate their canopy spread and their size on maturity may cause pressure for their removal. The remaining proposed street trees of the soft landscape palette (p.60) were considered smaller in stature.

9.55 The Trees and Woodlands Team also noted that the lime trees proposed on the primary and secondary streets would not be appropriate near residential uses, parking areas or high traffic areas as they have a number of nuisance issues that would place pressure on their removal.

9.56 In response to the comments HDA, the Agent submitted updated drawings to include the retained trees and woodland areas and the relocation of the Neighbourhood Equipped Area of Play (NEAP). However, further details were not provided, for example, in relation to structural planting. A rebuttal was also submitted in relation to HDA's comments. This was subsequently responded to by HDA (see second response).

9.57 Regarding some of the other points raised by HDA, it is noted that appropriate planning conditions could be added e.g. SuDS design to incorporate naturalistic designs and an external lighting strategy. These would help to mitigate landscape and visual impacts.

Summary

9.58 The overall landscape and visual effects are considered significant during the construction phase. At early stages of operation, significant landscape and visual impacts would still be apparent. After 15 years, the establishment of proposed planting would help to reduce the impacts. The impacts would generally reduce as the larger trees species mature further.

9.59 The proposed green infrastructure improvements such as the SANG, open spaces, orchards, allotments, parks and gardens and amenity spaces would help to mitigate the visual impacts by increasing the vegetation across the site, which is currently primarily arable and subsequently vegetation-bare. The majority of existing hedgerows and trees would remain and the built form would be softened and integrated in the landscape, overtime.

9.60 Some concern is raised over the proposed mandatory principles for street design, as sufficient space is deemed necessary to provide a strong corridor of larger trees along the primary route. In turn, this would soften the visual impacts of the proposed development parcels, particularly along the western side of the site, from the AONB.

9.61 It is acknowledged that the SANG and other open spaces could enhance parts of the site through landscape restoration. However, a strong north-south corridor with sufficient structural planting is considered important, particularly where areas of the development would not be broken up by mature planting in the proposed green wedges or other areas of open space. It is therefore considered important, if the application is approved, to ensure that a strong internal landscape structure can be provided, notwithstanding the street design principles set out in the Design Code. It may be necessary to increase the widths of the street verges and proximity to buildings in certain areas to provide larger trees. When considering the scale of the site, it is not felt that some minor adjustments to the mandatory street principles would result in significant impacts on other parts of the scheme e.g. quantum or layout.

9.62 It is noted that The Chilterns Conservation Board, Chilterns Society and the Countryside Charity have commented on the proposals. The Chilterns Conservation Board highlighted that the Green Belt here serves as a key means of managing the setting of the AONB as part of protecting its natural beauty and providing space within which that beauty may be enhanced through landscape restoration.

9.63 The Countryside Charity stated that *'development of the magnitude proposed would seriously and detrimentally affect the setting of the AONB.'* The Chiltern Society explained that the development would be detrimental to the AONB in terms of inter-visibility and should therefore add to the harm to be considered in the planning balance.

9.64 It is acknowledged that substantial landscape and visual impacts would arise as a result of the proposals, conflicting with the aforementioned policies. Whilst overtime the proposals would integrate into the landscape, the visual effects during the construction and earlier years of the operational phases would be significant. As such, the proposal would have a major negative impact on the landscape character of the area and adjacent AONB even for allowing for additional mitigation which might be secured by condition.

Chilterns Beechwoods Special Area of Conservation – Habitat Regulation Assessment

9.65 A Special Area of Conservation (SAC) is an internationally recognised designation for sites whose habitats and species have significant ecological importance. Dacorum is home to part of the Chilterns Beechwoods SAC (CBSAC). As a whole, the CBSAC comprises of nine separate sites scattered across the Chiltern Hills, including a number of counties.

9.66 Dacorum hosts two of these designated SACs both of which are also Sites of Special Scientific Interest (SSSIs): Ashridge Commons and Woods SSSI, which designation broadly corresponds with the extent of the Ashridge Estate, 2km to the east of the Site; and Tring Woodlands SSSI, which lies about 350m away (as the crow flies) from Tring Park and circa 2.3km southwest of the site.

9.67 The location of the aforementioned SACs have three main protected features, which are: (1) Beech forests on neutral to rich soils; (2) Semi-natural dry grasslands and scrub on chalk; and (3) Stag beetle populations. Beechwood forests form part of the most extensive area of native beech woodland in England and contain a number of notable and rare plants.

9.68 The CBSAC also has a unique character that can be difficult to replicate, hence designation guarantees a high level of protection to ensure the integrity of the site is protected.

9.69 Detailed surveying of the link between relative recreational pressure on European sites and risks of 'Likely Significant Effects' (LSE) to interest features and the achievement of their conservation objectives has been carried out with regard to the SAC.

9.70 After extensive research undertaken by Footprint Ecology (commissioned by DBC), Natural England produced a letter dated 14 March 2022 that made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development.

Ashridge Commons and Woods SSSI

9.71 The zones relating to recreational pressure extended to 12.6km (as this was determined from visitor surveys to be the principal recreational catchment for the Ashridge Commons and Woods component part of this European site). At distances from the SAC of 500m–12.6km the Mitigation Strategy SPD advises that development projects should be required to contribute toward provision of Suitable Alternative Natural Greenspace (SANG) and toward access management to the SAC (Strategic Access Management and Monitoring (SAMM)).

Tring Woodlands SSSI

9.72 The zones relating to recreational pressure extended to 1.7km, as this was determined from visitor surveys to be the principal recreational catchment for the Tring Woodlands component part of this European site. At distances from the SAC of 500m–1.7km the council has been advised by Natural England that the emerging Plan and major speculative development projects will be required to prove whether there will be LSEs on this unit of the SAC and where necessary contribute towards the provision of SANG and SAMM.

9.73 In respect of the recreational pathway, DBC, in consultation with Natural England, has formed the view that any net increase in residential development between 500m and 12.6km in a 'straight-line' distance from the Chilterns Beechwoods SAC (Ashridge Commons and Woods SSSI) is likely to have a significant effect on the integrity of the CBSAC, either alone or in-combination with other plans or projects.

9.74 In accordance with Part 6, Regulation 70 of the Conservation of Habitats and Species Regulations 2017, there is a duty that if a proposed plan or project is considered likely to have a significant effect on the SAC (either individually or in combination with other plans or projects), an Appropriate Assessment should be undertaken. This will assess the likely impact pathways and resultant impacts for the site in view of the site's conservation objectives. A significant effect should be considered likely if it cannot be excluded on the basis of scientific information and it might undermine a site's conservation objectives.

9.75 The council is working with Natural England and other relevant partners to agree a strategic mitigation strategy and once adopted this will enable the council to mitigate the impacts from granting of planning permission for residential development in the Borough.

9.76 At this time, in the absence of a strategic mitigation strategy or a satisfactory scheme specific bespoke mitigation package (both in terms of SAMM and SANG), there is insufficient evidence to allow the council to rule out that the development would not cause additional reactional pressure to the CBSAC and that its impacts, whether alone or in combination, could ensure that the harm to the integrity of the SAC would be avoided or mitigated.

Planning Policy and Legislation

9.77 European Sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended).

9.78 Paragraphs 10 and 11 of the Framework highlight that there should be '*a presumption in favour of sustainable development.*' However, this presumption '*does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*' (para. 182). 'Habitats site' has the same meaning as the term 'European site' as used in the Habitat Regulations 2017.

9.79 Paragraph 176 requires that potential Special Protection Areas (SPAs), possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

9.80 Paragraph 174 requires planning decisions to contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity. Further, paragraph 180 identifies that development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted.

9.81 Under Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site. Should a LSE on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) will need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

9.82 The Government's National Planning Practice Guidance (PPG) provides detail on Habitat Regulation Assessments and Appropriate Assessments (see Reference ID: 65-005-20190722).

9.83 The Core Strategy, Policy CS26, requires development and management action to contribute towards the conservation and restoration of habitats and species.

9.84 Saved Policy 102 of the DBLP states that sites of importance to nature conservation will be protected from development in accordance with their designation, value and scarcity. Saved Policy 103 goes on to say that where loss of features or habitats is unavoidable, the Council will require compensatory measures to replace or reinstate the nature conservation value that has been lost.

Appropriate Assessment

9.85 A Report to Inform Habitats Regulation Assessment (RIHRA) (Revision A) has been submitted as part of this application, setting out the LSEs of the proposals and then the 'integrity test'. Section 6 discusses the potentially significant effects on the CBSAC sites.

9.86 The initial scoping of potential pathways for effects identifies that, given the distances and intervening land uses, it is considered that there would be no significant effects relating to lighting or noise due to the construction or operational phases of the development proposals. Further, there are no hydrological links between the site and SACs, hence no pathways for contamination to arise at the designated sites as a result of surface water run-off, siltation or waterborne pollution.

9.87 Regarding the protected species (Stag Beetle), the RIHRA suggests that they are unlikely to be present in either of the Tring Woodlands SSSI or the Ashridge Commons and Woods SSSI based on the best available scientific evidence. In any case, the Report states that *"it is not of particular sensitivity to disturbance or other direct effects arising from an increase in recreational pressures at the SAC."*

9.88 The Report concludes that the development proposals would not be likely to have a significant effect on the SAC through lighting, noise, hydrological impacts, effects on calcareous grassland habitat, or disturbance to qualifying species (Stag Beetle), either when considered alone or in combination with other plans or projects. As such, no specific avoidance or mitigation measures are therefore proposed by the applicant in this regard.

9.89 The potential pathways for significant effects identified relate to: physical damage and disturbance to qualifying habitats due to increased recreational pressure from new residents; and air quality impacts arising from an increase in traffic movements within 200m of the SAC. The Report states that it is unlikely that new residents would access the SAC on foot but acknowledges that residents at the site could drive or use other transport means to access the SAC for recreation purposes, subsequently leading to potential habitat damage and disturbance.

9.90 The LPA agrees with the findings of the report that in relation to recreational pressure, that the proposed development would lead to likely LSEs relating to physical damage and degradation to habitats when considered alone or when considered in combination with other plans or projects.

9.91 In terms of air quality, the RIHRA explains that it is commonly agreed that, in general, deposition at 200+ metres from a road is at a level so small to be considered insignificant. As such, the assessment encompasses only Tom's Hill Road and the B4506, which lie within 200ms of Ashridge Commons and Woods SSSI. It is noted that some priority woodland habitats lie within 200m of these roads.

9.92 A further assessment of air quality has been undertaken based on the information provided in the Air Quality Consultant's (AQC) report (June 2022). Detail on predicted reductions in emissions is provided. For example, there is a decrease in road traffic exhaust emissions due to an increase in electric and fuel cell vehicles. Overall, the assessment concludes that, with regards to nitrogen dioxide (Nox), ammonia (NH3), nitrogen deposition and acid deposition, the proposed development is considered to result in 'negligible' effects at Ashridge Commons and Woods SSSI i.e. non-significant when considered alone or with other plans and projects.

9.93 Whilst no air quality assessment has been undertaken for the A41 which lies within 200m of Tring Woodlands SSSI, Natural England have confirmed that due to the siting of Tring Woodlands between the junctions of the A41, traffic generated to serve the development is unlikely to give rise to LSEs.

9.94 Taking the above into account, the LPA concludes that a further assessment in line with the Habitats Regulations (Appropriate Assessment) is required and mitigation and avoidance measures proposed.

9.95 In summary, an Appropriate Assessment cannot conclude that there will be no adverse effects on the integrity of the CBSAC and as such, the LPA therefore must consider potential mitigation or avoidance measures. Mitigation has been presented by the applicant through SANG and acceptance to provide SAMM in the form of a tariff.

Proposed Mitigation

Suitable Alternative Natural Greenspace

9.96 The application includes a large area of proposed SANG in the east of the site. Its role is to provide alternative green space to divert visitors from visiting protected areas such as the CBSAC as frequently through provision of enhanced green space choice. The RIHRA explains that the SANG has been designed in accordance with Natural England's guidance, which highlights that 8 hectares should be provided per 1000 residents. As such, 26.88 hectares would be required based on an average occupancy rate of 2.4 for 1,400 dwellings.

9.97 The proposal initially included 27.19 hectares of SANG but this has been increased to 37.56 hectares during the course of the application. A SANG Statement and Management Plan have also been submitted. It is envisaged that the SANG would provide opportunities for walking, dog walking, cycling and informal recreation. Existing public rights of ways including the canal tow path would be enhanced and a café provided as part of the SANG.

9.98 The RIHRA highlights that the former extent of the SANG would have accounted for 3,398 new residents but the expanded SANG could now account for 4,695 residents, an additional 1,297 people above the predicted population of the proposed development. The SANG would have a 5km catchment.

9.99 The majority of the SANG (27.19ha) would be delivered as part of the first phase of the development prior to occupation of any dwellings. The proposals indicate that the remaining SANG (10.76ha) would be delivered for other development proposals in the area, should they come forward. Whilst mentioned in the proposals, no mechanism or details are provided in the Heads of Terms (HoTs) for the proposed legal agreement ('Section 106 Agreement/S106 Agreement') regarding this and how it would work in practice.

9.100 It is suggested that the above-mentioned features i.e. the new habitats, the walks, café, etc. would result in the site becoming an attractive destination site to attract/pull residents away from visiting the CBSAC as frequently.

9.101 It is worth noting that the SANG cannot be both used for mitigation and Biodiversity Net Gain. Any improvements to the SANG required to meet SANG quality cannot be counted for Net Gain – this is to avoid double counting.

SANG Management and Maintenance

9.102 During the course of this application both Hertfordshire County Council's (HCC) Ecology Department and Natural England requested further information on the management and maintenance of the proposed SANG. Without this information they highlighted that the LPA would be unable to ascertain that the proposed development, as currently submitted, would not adversely affect the integrity of the SAC.

9.103 A SANG Management Plan (Document 33) was submitted in response to the above. The document includes various things such as landscape maintenance components, general maintenance and management tasks, habitat maintenance schedule, design criteria, visitor infrastructure and management costs.

9.104 Regarding the responsibility for implementation and delivery, the document explains that a suitable body would be appointed to take on stewardship and future management of the SANG. It further explains that *'there is certainty regarding the delivery of both the SANG infrastructure (by Harrow Estates) and ongoing maintenance funded via commuted sums.'* It points to the proposed S106/HoTs in relation to this.

9.105 The S106/HoTs Statement (Document 8a) states, *'The Owner shall establish a management company for the long-term management and maintenance of the SANG in accordance with the approved SANG Management Plan...the Owner shall procure that the management company is retained for so long as the SANG is open (unless otherwise agreed in writing by the Council).'*

9.106 The 'Summary of Contributions' Section notes that 27ha of land would be made available for SANG purposes, in addition to a £1,270,000 cost for implementing the Management Plan.

9.107 Responses from both HCC Ecology and Natural England explain that whilst the principle of the SANG element of the mitigation scheme appears acceptable, further information is required on the work taken place to identify a suitable body to manage the SANG in perpetuity. It is worth noting that in perpetuity in this context refers to the fact that management and funding must be secured for a minimum period of 80 years.

9.108 At this stage no further information has been provided regarding a suitable body for the management and maintenance of the SANG including implementation or identification of the long term landowner. Furthermore, whilst the SANG Management Plan identifies that there is certainty over the delivery and ongoing maintenance to be funded by commuted sums, no specific details have been provided in this regard. Whilst the HoTs state that the management company would be procured as long as the SANG is 'open' (unless otherwise agreed by the council), it does not deal with the possibility that the management company becomes insolvent or fails to discharge its obligations. No specific provision for step-in-rights for the council are included within the HoTs, nor a bond for the cost of future maintenance or repairs/replacement of infrastructure. Therefore, the proposals lack certainty that the mitigation would be secured in perpetuity.

Strategic Access Management and Monitoring

9.109 SAMM relates to financial contributions (usually per residential unit or per additional bedroom) towards mitigation measures involving visitor access management and monitoring measures through a SAMM strategy. Natural England's letter of 14 March 2022 identifies that SAMM is the preferred mechanism for managing impacts at CBSAC due to the draw that the designation has.

9.110 The SAMM strategy is currently being forged through discussions with Natural England, the National Trust and DBC (as lead authority for the rest of the LPAs within the Zone of Influence). The Agents have suggested that a bespoke solution in advance of the strategic solution could be advanced, however, the council's preference is to finalise the strategic approach.

9.111 Paragraph 7.5.22 of the submitted RIHRA (Revision A) explains that the Applicant is content to pay the required SAMM figure per unit once it has been agreed by the relevant parties. Furthermore, the RIHRA explains that as the phasing of the proposals would result in first occupation in 2023, there is likely to be sufficient time to agree and deliver the funds prior to that point.

9.112 At the stage of writing this report the draft mitigation strategy detailing the SAMM details has not been published, however, it is noted that this is due for imminent release. It is therefore considered that this matter should be capable of being addressed through the S106 Agreement. A further update will be provided prior to, or at, committee in this regard.

Summary

9.113 DBC concludes that LSE from recreational pressure on the Chilterns Beechwoods SAC cannot be ruled out in-combination with other plans or projects. There is a risk that the conservation objectives for the SAC will be undermined as a result of the lack of long terms reassurance of the ownership, management and maintenance of the SANG in perpetuity.

9.114 Whilst, it is accepted that Natural England are broadly accepting of the sites proposals, highlighting that they are agreeable to the SANG element of the mitigation scheme, they are particularly concerned that the long term management of the SANG has not been secured and the LPA cannot therefore be satisfied that the development will not adversely affect the integrity of the CBSAC in perpetuity.

9.115 The LPA accept that the SAMM element (tariff) is likely to be acceptable to the Applicant, however, this element is not currently available/formally agreed, so cannot be proven in the Appropriate Assessment as secured/mitigation for the SAC. Any decision would need to be subject to the scheme adhering with the SAMM requirements set out in the Mitigation Strategy and the S106 Agreement updated to reflect this.

9.116 Further information is required to rule out whether as a result of the development (alone or in combination) that it would not have a likely significant effect in terms of recreational pressure on CBSAC.

9.117 In accordance with paragraph 182 of the Framework, the Appropriate Assessment has concluded that the project will adversely affect the integrity of the designated sites. Therefore, DBC as the Competent Authority consider the proposals not to be acceptable under the tests of the Habitats Regulations.

Housing Delivery

Standard Method

9.118 The standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach.

9.119 The introduction of the national standard method to assess the local housing need since adoption of the Core Strategy has meant that DBC (and other authorities) are having to meet the difficulties of accommodating dramatically increased housing numbers. In DBC's case, this has risen from 430 homes per annum in the Core Strategy to 1,023 dwellings per annum (dpa) through the standard method (an uplift of over 230%). It should be noted that the Applicant's Socio-Economic Impact Assessment (Document 15) has updated this figure to 1,018dpa as at March 2022, as the 'current year' baseline.

Housing Delivery Test

9.120 The Government's Housing Delivery Test (HDT) was introduced in 2018. It compares how many homes should have been built over the last three years in each local authority area with how many actually were.

9.121 Where more than 95% of the required homes have been built, the test is passed and councils need take no action. If delivery is below that level, councils will be required to investigate the reasons and publish an action plan explaining how they will catch up. There are escalating sanctions applied based on the scale of any shortfall, set at 85% and 45%.

9.122 The Government's original 2021 results revealed that DBC has delivered 89% of its housing requirements between 2017 and 2020 i.e. 1,685 homes out of an assessed requirement of 1,887 homes and therefore DBC created an Action Plan, which was published in 2021.

9.123 DBC's HDT Action Plan (2021) explained that Dacorum had seen a marked increase of delivery in the last 5 years (2016-21) with an average of 608 homes built each year. Much of this is as a result of larger schemes coming on-stream and as a consequence of the relaxation of the planning system and prior approvals regime, particularly in respect of the conversion of offices to residential.

9.124 The latest results were published by the Department for Levelling Up, Housing and Communities (DLUHC) on 14th January 2022, which recalculated the results by reducing the number of homes required in light of the Covid-19 Pandemic and the disruption caused.

9.125 The 2022 measurement makes clear that the borough has delivered in excess of the target set by Government for 2020/21. 755 new dwellings were completed, a record year for delivery despite the impacts of the global pandemic on the construction industry during that time. It surpasses the requirement of 681 dwellings set by DLUHC.

9.126 As set out in the HDT Action Plan, it is accepted that more can be done regarding housing delivery in the future (as set out in sections 6 and 7 of the HDT Action Plan). However, the delivery of housing is not considered so severe that a 20% buffer is required for the purposes of calculating housing supply (which is the sanction applied if delivery falls below 85% of the required amount), or that the presumption in favour of sustainable development applies as a consequence of past under delivery.

Council Housing Completions

9.127 DBC is one of the more active authorities in Hertfordshire in directly bringing forward council homes, both in terms of its own land ownership and land it has bought on the open market. This has helped support housing completions generally in the borough. It has a proactive housing delivery team which has delivered nearly 300 homes over the period 2013-21, of which 162 of these were completed in 2019/20, representing 33% of all completions that year.

9.128 DBC have also sold a number of under-used garage blocks for affordable and market homes under our Garage Disposal Programme since September 2014 when Cabinet gave approval for the disposal of 97 of these sites. The council has continued to review sites to establish their suitability for development.

Five Year Housing Supply

9.129 The five year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement (or, in some circumstances, local housing need) over the next 5 years.

9.130 The Council is not at present able to demonstrate a 5-year supply of deliverable housing sites as required by the Framework and therefore the policies of the development plan most important for determining the application are out of date. However, the tilted balance is not engaged if the site lies within the Green Belt and in the absence of the demonstration of very special circumstances, the Framework's Green Belt policy provides a clear reason for the refusal of planning permission (see Framework footnote 7).

9.131 DBC's latest published position as at 1st April 2020 explains that that under the best circumstances of the 5% buffer, the council can only deliver a maximum of 3.2 years' worth of housing supply. It is unlikely that the Council will be able to demonstrate a sufficient supply until the new Local Plan is adopted as the existing spatial strategy cannot fully support delivery against the local housing needs figure.

9.132 The Applicant's submission puts forward that the DBC has a current deliverable supply of 2.17 years. The Strategic Planning Team were contacted on this matter. They have determined that the current housing supply is in the region of 2.5 years, which is higher than that put forward by the Applicant, but lower than the latest published position.

9.133 The precise figure is difficult to determine given the current issues relating to the Chilterns Beechwoods SAC. The Strategic Planning Team consider the supply figure of 2.5 years is on the cautious side to allow for some resilience in relation to this.

Density of Residential Development

Planning Policy

9.134 Saved Policy 21 of the Dacorum Borough Local Plan (DBLP) (2004) states that sites will be expected to demonstrate densities of between 30 to 50 dwellings per hectare (dph). The policy goes on to state that, for sites on the edge of the settlement, particular attention should be given to the effect of development density upon open countryside and views.

Assessment

9.135 The average net density of housing development across the site is discussed in the Planning Statement, paragraph 17.19. It confirms that the site will fall within the range of 30-50dph as per the requirements of saved Policy 21. It also highlights that special attention has been paid to the effect of development density on the open countryside and views, referring to the Design Code (Document 10) for specific details.

9.136 The Design Code identifies that despite an overall density of 30-50dph, density differs between the character areas and typologies within these areas. For example, the 'Garden Suburb Core' has an overarching density of 30-40dph with higher density in the primary streets, mews and courtyards (GS1 and GS4) and lower density in the secondary streets, central green and in areas overlooking existing hedgerows and trees (GS2 and GS3) (see page 126 in the Design Code for more detail).

9.137 The density of the character areas are set out in the following table:

Table 3 – Character Area Overall Density

Character Area	Density (dph)
Orchard Quarter	25-35
Outer Garden Suburb	25-30

Station Road	25-35
Garden Suburb Core	30-40
Village Centre	Up to 40
Village Edge	20-30

9.138 The average density across the site would fall within the guidance of 30-50dph as per saved Policy 21. The separate character areas provide contrast in density with the largest area, the 'Garden Suburb Core', and the 'Village Centre' providing medium-to-high density across the central parts of the site with lower densities generally provided towards the more sensitive edges (e.g. adjacent to existing properties or the SANG).

9.139 The proposals would meet policy requirements in terms of an overall density figure and provide a sufficient mix across the site. The overall approach to density is therefore considered acceptable.

Housing Mix

9.140 There are a number of supporting documents that provide information on the proposed housing mix, including the Housing Needs Statement (Document 14) and its associated technical reports, Affordable Housing (Document 14i), Self-build and Custom Housing (Document 14ii), and Older Persons' Housing Needs (Document 14iii). These documents also set out an assessment of the various components of housing need and supply in Dacorum.

Planning Policy

9.141 The Government requires the planning system to significantly boost the supply of homes, ensuring that a sufficient amount and variety of land comes forward where it is needed and that the needs of groups with specific housing requirements are assessed. Further, the size, type and tenure of housing for different groups in the community must be considered, including those who require affordable housing (see Framework, Section 5).

9.142 Policy CS18 requires housing developments to provide a choice of homes. This comprises a range of housing types, sizes and tenure; housing for those with disabilities and affordable housing in accordance with Policy CS19. The policy goes on to state that the mix and type of housing within development will be guided by evidence such as Strategic Housing Market Assessments (SHMA) and other site-specific considerations. Saved Policy 18 states that the development of a range of dwellings (size and type) will be encouraged.

Assessment

9.143 The LPA's Pre-Application Advice (21st January 2022) suggested that the Applicant proposes their own housing mix based on market research and discussions with housing associations and registered providers. The LPA explained that if the application is approved, and when considering the time it takes to build out, it may be that market conditions have changed. As such, the LPA would not want to impose a rigid housing mix.

9.144 The Applicant has provided the above-mentioned evidence base, which has identified that a majority of the housing need is for housing, with some flats identified. In terms of affordable housing, the evidence points towards larger numbers of smaller units (1 and 2-bedroom) for affordable housing, with larger units (3+ bedrooms) in the market sector.

9.145 The submitted Housing Needs Statement concludes that in general, "a wide range of new housing is required, including market housing, affordable homes to rent and buy, first homes, accommodation for older persons, and opportunities for self-build or customised housing."

9.146 The proposed housing breakdown is shown in the following table.

Table 4 – Housing Breakdown

	1 bed	2 bed	3 bed	4+ bed	Tenure %
Market	24	140	322	216	50%
Affordable Rent	143	117	143	21	30%
Affordable Home Ownership / First Homes	53	84	51	17	15%
Self-Build / Custom Build	2	14	32	21	5%
Total	222	355	548	275	100%

9.147 The proposals indicate that extra care accommodation for the elderly could be accommodated within the above mix. The Housing Needs Statement, Paragraph 5.10, notes that in this case, it is assumed that the number of 1 bedroom market sale homes would be increased, with the proportionate reductions in the number of 2 to 4-bedroom market homes being made accordingly.

9.148 The proposed development proposes a wide range and mix of new homes, which include different types, sizes and tenures to meet a variety of needs. The proposed mix is evidence-based and in-line with the needs of the Borough and more locally in Tring. The scheme is therefore considered policy-compliant in this regard.

Affordable Housing

9.149 Policy CS19 suggests an overall policy objective of 35% affordable housing with a 75/25 affordable rent/intermediate housing tenure. For Greenfield sites, such as local allocations, the Core Strategy usually requires 40% affordable housing. The Government now requires 25% of affordable homes to be 'First Homes', which are market sale units discounted by a minimum of 30% against the market value and have a price cap, after the first discount, of no greater than £250,000 (outside London).

9.150 The application offers 45% (630) of all new dwellings as affordable housing, to be secured through the proposed S106 Agreement. The proposed tenure split of the first 40% of the housing would comprise 75% affordable rent and 25% affordable home ownership including First Homes. The further 5% would be wholly affordable home ownership including First Homes. The proposal therefore meets policy requirements in terms of tenure split and exceeds policy requirements in terms of provision.

Self-Build and Custom Housing

9.151 Paragraph 62 of the Framework explains that local authorities should provide opportunities for people who wish to commission or build their own homes.

9.152 The application proposals include 70 serviced plots for the provision of self-build and custom housebuilding, which equates to 5% of the total proposed units. As per the affordable housing, this would be secured through the legal agreement, if approved.

9.153 Whilst there are currently no adopted local policies that require this type of housing, it is reflected in national policy together with policies in the draft emerging Plan. Strategic Planning have confirmed that the total number of people on the Dacorum Self-Build Register as of 31.07.22 was 205, with nine applicants from Tring. It is further noted that since 31.10.2014 there have been nearly 230 CIL exemptions indicating self-build or custom house build, 11 of which were in Tring. Overall, considering the number of self-build applicants, the proposed self-build and custom housing is welcomed.

Older Persons Housing

9.154 Chapter 14 of the Core Strategy discusses requirements for extra care housing and residential care. Policy CS18 identifies the range of housing types required including those with special needs.

9.155 The Applicant's Older Persons Need Assessment (Document 14iii) identifies increased demand for specialist housing for older people, which has been triggered by an aging population.

9.156 The proposed development makes provision for up to 10% (140 units) of accommodation for older persons. The Planning Statement explains that this is likely to be in the form of an extra-care facility.

9.157 The provision of older persons accommodation would contribute to meeting wider housing needs and is therefore supported and considered as benefit of the proposals.

Summary

9.158 The evidence-base informing the Applicant's approach towards the mixture of housing appears thorough. The proposal is of a significant scale to deliver a much wider range of housing than would normally be the case for smaller schemes. The proposals would provide an appropriate balance between housing types, sizes and tenures to meet a variety of needs. This includes provision of a significant amount affordable housing and accommodation for older persons. As such, the proposals are considered acceptable in this regard.

Quality of Design

9.159 In terms of the wider masterplan area, the detailed design of the overall layout and individual buildings within it are to be considered at the reserved matters stage. However, the Applicant has provided parameter plans, which serve to establish a structure for the development, as well as an illustrative masterplan, which serves to show the potential configuration.

9.160 The Design Code was initially submitted in draft format but following discussions and amendments, a final version was provided. The purpose of the Design Code is to accompany the submitted Design and Access Statement (DAS) (Document 9) to provide design guidance and principles for the proposed development. The proposed Design Code would be used at reserved matters stage to ensure that the established design principles are embedded in the final design.

9.161 As mentioned in the Planning History section, the Applicant has engaged with DBC's Community Review Panel and a number of their own design code workshops to help inform the design proposals, as well as other elements of the scheme.

Planning Policy

9.162 Section 12 of the Framework identifies that good design is a key aspect of sustainable development, creates better places to live and work and makes development acceptable to

communities. Furthermore, high quality, beautiful and sustainable buildings and places are fundamental to what the planning and development process should achieve.

9.163 Permission should therefore be refused for poor design that fails to improve the character and quality of an area and the way it functions. Equally, if the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

9.164 The emphasis on good design is highlighted in the Core Strategy, Policies CS10, CS11 and CS12; which state that development should coordinate streetscape design between character areas, integrate with such character, and respect adjoining properties in terms of layout, site coverage, scale, height, bulk, landscaping, and amenity space.

9.165 Appendix 3 of the DBLP states that development should be guided by the existing topographical features of the site, its immediate surroundings, and respect the character of the surrounding area with an emphasis on there being adequate space for the development in order to avoid a cramped appearance.

9.166 Dacorum's Strategic Design Guide ensures that new development is of the highest quality and contributes towards making distinctive, attractive and sustainable places to live and work.

Assessment

9.167 The DAS explains the policies to which the outline designs have been based, including the National Design Guide and Model Design Code, DBC's Strategic Design Guide and Garden Village Principles. It provides detail on the concepts and evolution of the scheme, following outcomes from public engagement.

9.168 The document explains that a key influence on the masterplan work was an aspiration to maintain the network of hedgerows across the site and provide strong links to the canal.

9.169 A character evaluation exercise was undertaken to establish the existing characteristics of Tring. In summary, it highlights that:

- The density varies across Tring with lower density at the fringes and higher density on primary routes. The pattern, grain, typology and form follow this trend, transitioning from higher density in the town centre to the sensitive edges overlooking the countryside. Distinct character areas are present throughout the town.
- The suburban character is prevalent in the east of Tring.
- Architectural styles and materials are the most distinct element that make up the character of a place. Red brick, terracotta tiles, flint, clay roof tiles are key building materials associated with Tring. Some main contributors to Tring's architectural character are the Victorian and Edwardian buildings, built in Tudor revival tradition of timber framed construction. Patterns of repeating gables and sub-gables is a consistent streetscape character across Tring.

Proposed Design

9.170 The proposed scheme is split into six character areas, which comprise the Garden Suburb Core, Village Centre, Orchard Quarter, Village Edge, Outer Garden Suburb and Station Road. The Design Code illustrates that each character area would benefit from its own character in terms of location, design principles, block layout and materials. The specific design principles include the following details: access, frontage character and setback, use, building height and typology, density, boundary treatments, materials and parking.

9.171 The Garden Suburb Core constitutes the largest character area, with a suburban character typically comprising terraced, detached and semi-detached houses at a medium-high density (30-40dph).

9.172 The Village Centre forms the civic heart of the development, providing the majority of the non-residential uses e.g. local amenities, schools and leisure. This area would be generally denser with taller buildings.

9.173 The Orchard Quarter and Village Edge provide lower density development to respond to the adjacent edges of the development, for example, it is suggested that the Orchard Quarter would provide buildings of linear form and courtyard groupings to draw inspiration from the surrounding rural settlements and farmsteads.

9.174 The Outer Garden Suburb is situated next to the existing properties on the edge of Tring and therefore the Design Code explains that the proposals would respond sensitively to existing buildings. A low density is provided here.

9.175 The Station Road character area is proposed to provide medium to high density along the Station Road corridor with a rich variety of forms and materials.

9.176 It is proposed that a new tree-lined spine road would provide a link through the development, connecting Station Road and Bulbourne Road with green wedges/fingers opening towards the canal corridor. The character areas would be accessed from this main road. Aside from the green connections, the following features would also intersect with the spine road:

- Existing hedgerows/trees;
- Traffic calming measures;
- Main cycle/footpaths; and
- Mixed uses located at intersections.

9.177 The layout would comprise one 'village centre' with a series of focal points along the main street. Large areas of open space and proposed adjacent to the canal with green wedges. The proposed playing fields would be adjacent to these open spaces.

9.178 A number of parks, gardens and open spaces would be provided, including Marshcroft Gardens (North/South), Marshcroft Green, Woodland Garden, Heritage Garden, Orchards, Community Wildlife Garden and the SANG – see DAS, Figure 11.

9.179 The Station Road Corridor is discussed in specific detail and the application aims to enhance the connectivity between Tring to its railway station, as the consultation and engagement events highlighted issues with safety and security, particularly outside of daylight hours.

9.180 The 'Regulatory Plan' in the Design Code sets broad design fixes for various land uses (see Figure 6, p26), including the sports hub and facilities, schools, inner parcels of open space, primary/secondary streets, traffic calming/public realm areas, frontage typologies and marker buildings.

Building Heights

9.181 Initially, the proposed maximum building heights were relatively consistent across the site, allowing a maximum height of three-storeys (up to 11 metres). Following discussions with DBC's Urban Designer, it was agreed that variety in building heights would be provided across the character areas, for example, within the Garden Suburban Core, the heights would be

predominantly two-storey (up to eight metres) with occasional three-storey units (up to 12 metres), whereas the Station Road Character Area allows for a range of 2/3-storey houses (up to nine metres) with occasional taller marker buildings. The school and community buildings would have a maximum height of three-stories (12m).

Building Appearance

9.182 The detailed design of buildings would be established in future reserved matters applications, which would be required to demonstrate compliance with the proposed material palette in the Design Code and parameter plans. However, the Design Code sets out certain principles for the individual areas e.g. materials.

9.183 DBC's Principal Urban Designer has reviewed the proposals and raised some concerns over certain elements of the design, for example, the amount of render proposed (see responses). Following discussions with the Applicant, a revised Design Code was submitted to address a number of issues raised. For example, the percentage cap on the use of brick was removed. However, concerns were still raised over the inclusion of white render in all of the character areas, as this would be highly visible when viewed from a landscape context. It was suggested that 2-3 areas should comprise render.

9.184 The revised proposals, at this outline stage, broadly respond to the context of Tring. A variety of building heights would be provided. The dominant wall material would be red-brick with differing details/features (tile hanging, decorative bonds, patterns, etc.). Other materials would be used e.g. buff brick, brown multi-brick and render to add variety. The roofs are generally pitched, hipped and gabled with red and reconstituted slate/grey tiles. The Orchard Quarter would differ somewhat, with timber boarding and timber shingles together with brickwork being the dominant wall material.

9.185 The Principal Urban Designer noted that the masterplan proposals still require design changes to be made to ensure the vision for this site is delivered. As such, several conditions were suggested to mitigate some of the outstanding design concerns and ensure quality is delivered. These will be discussed in the 'Summary' section below.

Accessible and Adaptable Dwellings and Spaces

9.186 Saved Policy Local Plan Policy 18 (the size of new dwellings) states as follows (for open market and affordable housing schemes):

'At least 10% of all dwellings on housing sites accommodating 25 or more dwellings shall be designed as life-time homes (i.e. they shall be readily accessible and usable by a disabled or elderly person or capable of adaptation for such use at minimal cost).'

9.187 The design approach should also accord with Policies CS18 (Mix of Housing) and CS29 (Sustainable Design and Construction) in this regard.

9.188 The 'Housing Quality and Design' section of the Health Impact Assessment (Document 16, Revision A) provides detail on the accessible and adaptable homes within the development. Section 5.7 states that the Applicant commits to providing homes that at Building Regulations M4(2) compliant to support independent living for older and disabled people.

9.189 The Design Code highlights the provision of accessible play spaces that would provide opportunities for disabled and non-disabled children to play together. In addition, the Design Code highlights that the allotments would be designed to meet the needs of disabled and older gardeners. A policy-compliant level of parking (5%) is also committed to.

9.190 All of the above would be captured through more detailed design at reserved matters stages; however, it is useful to understand the Applicant's commitment to providing a fully accessible development to meet the needs of vulnerable groups.

Street Types and Designs

9.191 The Design Code sets out a street hierarchy and a number of mandatory design principles such as the speed limit, use of street trees and parking restrictions. These are set out for primary, secondary and tertiary streets in addition to the mews, private drives and Station Road corridor. The proposed street hierarchy appears suitable, providing a range of types and designs across the development to suit each character area and their likely footfall and vehicular activity.

Civic Space

9.192 The Principal Urban Design has identified that although the illustrative material shows a public space surrounded by active mixed-uses, the Design Code states that the square can be delivered with large amounts of car park use integrated instead of a core public space. They noted that this is not considered as a good design principle and would not safeguard the delivery of high quality civic space. Specifically, the following mandatory design principles were highlighted as a concern:

'Mandatory Design Principals for Village Square:

5. Parking for visitors to the commercial units should be well designed and integrated within the Square.

6. The different components that make up the Square - carriageway, pedestrian paths, cycle way, parking, street furniture - should be held together by an attractive grid of street trees and pavement design.

8. 3. Parking for the retail and community facilities shall be provided within the Village Square. They shall be well-designed and integrated into the public realm with high quality street furniture and planting. Access options for delivery and servicing of the retail and community facilities shall be integrated within the public realm design.'

9.193 It is agreed that if they key area of civic space is dominated by car parking it could potentially result in poor placemaking. Subsequently, the Village Square may not provide the envisioned civic and community heart – a key part of the project that would provide a meeting point and sense of community.

Designing Out Crime

9.194 Paragraph 5.18 of the updated Design Code includes a number of principles for designing out crime for example the use of natural surveillance and appropriate lighting. Whilst full design details have not been provided at this stage it is considered that the LPA in consultation with the Applicant and Hertfordshire Constabulary would be able secure a safe and satisfactory design in relation to crime prevention at reserved matters stage.

Summary

9.195 The detailed design including layout and building appearance is not for determination at this stage. Considering the scale of the project and outstanding concerns from the Principal Urban Designer, a number of conditions to refine the design and capture certain elements have been suggested. The conditions relate to:

1. A further set of quality or design review panels at the reserved matters stage focusing on the design and vision for the village centre, a review of the architectural interpretation of the character areas and the public realm framework – with a focus on walking and cycling and wider connections. The sessions would ensure the delivery of a successful place and community with a high quality design.
2. A requirement for a Building for a Healthy Life assessment to ensure that the parcel layouts and wider masterplan are well integrated, distinct and inclusive for future residents.
3. A landscape concept plan for the village centre to establish the key principles for the public square to establish the relationship between public realm, community space and car parking.
4. Provision of 3D massing and visuals at reserved matters stage including street scenes and key views from public footpaths, particularly from within the AONB.
5. A limit on the use of white render on buildings across all of the character areas, as it is believed that this would result in visual harm in views from the wider landscape and negatively impact the AONB. It is recommended that this is limited to three character areas or two if the Garden Suburb Core is included, as it is the largest character area.

9.196 Whilst the reserved matters stage would provide further detail on design, it is considered that the conditions above would help to capture and develop important parts of the scheme. Notwithstanding the details within the mandatory design principles, it is considered appropriate to request the conditions above should the application be approved.

9.197 In relation to point 5 above, it may be preferable to determine the most appropriate locations for white render through the quality or design review panels, as certain areas of the site are considered more sensitive in terms of landscape and visual impacts.

9.198 The proposed building heights as detailed in the overarching Building Heights Parameter Plan (Document 4a, Part 3, Revision A), and more precisely within the character area mandatory design principles within the Design Code. These are considered acceptable and would provide some variety across the development, whilst also reflecting the need to respect the amenity of existing local residents in accordance with Core Strategy Policy CS12.

9.199 The set of design principles for the wayfinding/signage, street furniture, public art and lighting are all considered acceptable. However, as addressed in other parts of this report, some concerns have been raised over the principles for streets, public realm and landscaping. Primarily in relation to the provision of suitable tree species, sufficient space for structural planting and the concept for the civic space.

9.200 Section 12 of the Framework places great emphasis on the role of good design in place making. On balance, it is considered that the detail submitted, along with the above-mentioned conditions, would allow the scheme to respond appropriately to the key relevant principles within Dacorum's Strategic Design Code, as well as more general design considerations with Core Strategy Policies CS10, CS11, CS12 and CS13.

9.201 It is emphasised that the reserved matters, in light of the parameters set out in this application and aforementioned conditions, has the opportunity to secure a high quality design scheme with the appropriate level of interest and variety, which pays respect to the context in which it sits.

Environmental Implications

9.202 The environmental implications associated with the proposed development are primarily discussed in the Environmental Statement (Document 6), the Framework CEMP (6i) and the relevant Appendices (G.1-G.8). It should be noted that a further 'Air Quality Note' (July 2022) was received following comments from DBC's Environmental and Community Protection Team (ECP).

Air Quality

9.203 The Environmental Statement includes an Air Quality chapter, which lays out the impact of air quality impacts on the site and surrounding area. The document provides the assessment criteria in which air quality has been assessed and covers construction impacts (dust and traffic), road impacts (traffic), residual effects, cumulative effects and mitigation. Both human health and impacts on ecology are discussed. As highlighted in the documentation, this has been undertaken in the context of relevant national and European standards.

Planning Policy

9.204 The Framework, Para. 186, states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

9.205 Paragraph 105 also identifies the role that sustainable transport and genuine choices of transport modes can make to reducing congestion and emissions, whilst improving air quality and public health.

9.206 The Core Strategy, Policy CS32 (Air, Soil and Water Quality), requires development to maintain air quality standards and ensures that any proposals that would cause harm from a significant increase in pollution (including air) by virtue of fumes or particles will not be permitted.

9.207 Saved Policy 51 of the DBLP ensures that air pollution and air quality implications of transport demands arising from development should be specifically considered.

Assessment

9.208 The submitted information explains that construction activities, without mitigation, would range from negligible to high risk of dust impacts. Therefore, a number of measures have been identified based on the level of risk of adverse effects during construction, which are proposed to be implemented during construction to minimise emissions (see Section G.5.2 of Appendix G.5). The resultant residual effects are described as 'not significant'. These details could be captured through a Construction Environmental Management Plan (CEMP) condition should the application be approved.

9.209 The proposed development would lead to an increase in traffic on the local road network during construction and operational phases; however, the assessment confirms that there would be negligible adverse impacts at some existing receptors and the overall air quality effects would be 'not significant'.

9.210 Dacorum's Environmental and Community Protection (ECP) Team highlighted that a worst-case scenario for peak construction traffic and fully operational development has only been run for up to 2027, when just 400 of the 1,400 homes will have been built; whereas the Construction Transport Management Plan states that the majority of the housing will not be completed until 2032. This issue was raised with the Agent and further information was received from Air Quality Consultants Ltd explaining that peak occupancy coinciding with peak construction traffic had been

modelled for 2027 to represent an estimated worst case scenario (see Air Quality Note, July 2022). ECP were happy with this explanation.

9.211 Within the Borough of Dacorum there are three Air Quality Management Areas (AQMAs) identified for exceedances of the annual mean nitrogen dioxide objective, predominantly as a result of emissions from road transport. The nearest AQMA lies 4.5 km from the site in Northchurch. ECP requested that an air quality assessment for sensitive receptors within Northchurch be included within this application. An assessment was made and detailed in the Air Quality Note, which concluded that “even when it is assumed that the entire development will be operational in 2027, the additional road traffic emissions result in negligible impacts at all receptors.” Therefore, the overall air quality effect within Northchurch is predicted as ‘not significant’ and no additional mitigation is proposed.

9.212 The Air Quality Note states that future air quality conditions at the site would be acceptable, with pollutant concentrations predicted to be below the objectives across the site. Further, the proposal would not have an adverse effect on local air quality conditions and would not introduce new exposure within an area of poor air quality and therefore no additional mitigation is proposed. The cumulative effects would also be ‘not significant’.

9.213 Based on the further information provided, ECP raised no objection to the proposal subject to the imposition of three conditions relating to: (1) construction traffic management plan; (2) construction and environmental management plan; and (3) operational phase travel plan. However, they noted that although the cumulative effects of the development are considered ‘not significant’, they recommended the use of the Defra Air Quality Damage Cost Appraisal (DAQDCA).

9.214 The DAQDCA can be applied to key road links associated with a reduction in local air quality at relevant receptors; for example, Station Road and Cow Lane in this case. ECP highlighted that a commitment should be required from the Applicant that the value of any calculated damage costs (if any) is made available to the council for investment in measures, over and above those sustainable travel measures already promised, to mitigate air quality impacts of the proposed development.

9.215 The development as a whole would result in a negligible adverse impact on local air quality. This means that the development would result in a 2-5% increase in pollutant concentrations within the 75% or less of the Air Quality Action Level (AQAL). Therefore, whilst there would be a reduction in predicted baseline air quality at some locations, the impact of this reduction is quantified as negligible.

9.216 ECP explained that whilst basic air pollution mitigation is offered, the development as a whole would result in a negligible adverse impact on local air quality. Any damage costs via the DAQDCA could be invested in projects to further offset the air pollution impact of the development. The scale and nature of the development is such that the damage costs would be fair and reasonable. Although not specifically objecting to the proposals, ECP note that the reason for this is because there is an expectation that there would be additional air quality mitigation possible by way of money secured through the application of the DAQDCA.

9.217 A further note was received from ECP, noting the policy situation in relation to the DAQDCA. Whilst not specifically mentioned in local policy, the Framework, paragraph 174 (e) states that planning decisions should contribute to and enhance the natural and local environment by...wherever possible, help to improve local environmental conditions such as air quality. The Applicant has not agreed to use the DAQDCA if the application is approved. Considering that a negligible impact has been identified, it is not considered that the application would be refused in the absence of the DAQDCA. The impact is not considered sufficient, even unmitigated, to justify

its imposition and would therefore not be felt to meet the requirement of regulation 122 of the Community Infrastructure Levy Regulations in terms of necessity.

Noise and Vibration

9.218 The application is supported by a noise survey (see Appendix H.1-H.3). The methodology and findings are set out within the Noise and Vibration chapter of the accompanying Environmental Statement (pages 209-228). This chapter assesses the likely significant effects of the prevailing noise climate upon noise-sensitive components of the proposed development, specifically on the proposed residences, schools and SANG. Furthermore, the likely significant noise and vibration effects at existing residences, employment uses, the canal and environs from construction activity and traffic are considered.

Planning Policy

9.219 Paragraph 174 of the Framework identifies that planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise pollution.

9.220 Planning *'decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum the potential adverse impact resulting from noise from new development – and avoid giving rise to significant adverse impacts on health and quality of life...'* (Para. 185).

9.221 As such, the proposed development should avoid noise and vibration nuisance to surrounding properties/premises in accordance with Policies CS12 and CS32 and Paragraph 130 (f) of the Framework. Any development proposals which could cause harm from a significant increase in pollution by virtue of noise will not be permitted.

Assessment

9.223 The Environmental Statement highlights that without the implementation of appropriate noise mitigation measures, construction site noise may give rise to short-term noise impacts of up to 'Moderate Adverse' significance during periods where the noisiest activity is taking place at the closest points to existing noise-sensitive receptors that border the site. Mitigation is therefore recommended by implementing appropriate measures in accordance with best practice guidance set out in BS5228-1 (Code of practice for noise and vibration control on construction and open sites). It is concluded that with the implementation of appropriate measures, the residual noise impact from construction works is likely to be of 'Minor Adverse' significance or less and only for a temporary period at any noise-sensitive location.

9.224 Regarding the operational phase, it is identified that some noise mitigation measures would be required e.g. glazing, ventilation systems, acoustic screening, etc. for the proposed residences in proximity to Station Road and Bulbourne Road, in accordance with BS8223 (Guidance on sound insulation and noise reduction in and around buildings). It appears that no noise mitigation is required for the proposed schools to achieve acceptable internal and external noise limits. Limits have been set for the proposed commercial uses and mechanical plant.

9.225 The ECP Team have reviewed the submission in respect of noise and vibration, highlighting that the level of detail is acceptable but that a number of conditions would be required, should this application be approved, ensuring that the methodology and mitigation outlined in sections 12.8-

12.12 is implemented across the whole development and maintained throughout. Further, a request for a construction management plan condition has been made.

9.226 The proposals have been assessed in respect of noise and vibration. Overall, the proposals have been assessed as not having a significant impact in this regard. It has been confirmed that the development would not be subject to any noise or vibration impact that cannot be sufficiently mitigated against. Therefore, the proposals appear to align with the aforementioned policies in this regard.

Loss of Agricultural Land

9.227 Chapter 13 of the Environmental Statement discusses agricultural land and the likely significant effects associated with the proposals in relation to the loss of this land and soil resources. It explains the method of assessment, establishes baseline conditions, likely significant effects, mitigation measures and any likely significant residual effects.

9.228 The application is also supported by an Agricultural Land Classification and Soil Resources Report (Environmental Statement, Appendix I.1), which includes the classification and soil survey results.

Planning Policy

9.229 The Framework (paras. 174-175) advises local planning authorities to strive to protect the Best and Most Versatile agricultural land (BMV) (classified as Grades 1, 2 and 3a in the Agricultural Land Classification (ALC) system) from 'inappropriate and unsustainable development' and consider areas of poorer quality land (Grade 3b, 4 and 5) for significant development instead.

9.230 The PPG repeats the policy in the Framework in respect of soils, stating that the planning system should protect and enhance valued soils because they are an essential finite resource that provides important ecosystem services, such as a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution.

9.231 Saved Policy 108 of the DBLP echoes the above approach, stating that development that would result in the permanent loss of BMV agricultural land will be refused, unless it can be demonstrated that there is an overriding need for the development and there is no alternative land of a lower quality which could reasonably be used. Furthermore, planning permission will not be granted for development that would fragment farm holdings unless mitigation is possible e.g. the land can be incorporated into surrounding holdings and there is no severance of buildings from the land.

9.232 The Department for Environment, Food and Rural Affairs (Defra) have produced a Soil Strategy for England (2009) that sets out a vision to sustainably manage all of England's soils by 2030. It advises that the protection, use and movement of soils should be considered from the outset of planning projects and through its design, construction, maintenance and operation phases.

Alternative Land

9.233 As required by the Framework and saved Policy 108, an assessment of alternative land of a lower quality should be undertaken to ensure that BMV land is protected, where possible.

9.234 Evidence gathered for the emerging Plan considered agricultural land quality across numerous sites in the Borough. An extract from the AECOM Site Assessment Study (Volume 3, Part 3, p.163-164) highlights the following in relation to this site.

‘Overall site conclusion comments: Site has significant constraints in terms of Green Belt, and also performs relatively poorly on heritage, landscape (including AONB setting) and agricultural land quality. However, its Green Belt constraints are considered to be outweighed by its slightly better performance on these latter criteria, combined with even better performance on other criteria. Additionally, scale of the site and ability to deliver significant growth, i.e. regeneration and economic benefits, are further major advantages. As such, the site is considered potentially suitable for allocation but with major constraints.’

Overall site conclusion – final rating: Potentially suitable for allocation with major constraints.’

9.235 The above identifies a constraint in terms of agricultural land quality but appears to explain that the ability for the site to deliver significant growth outweighs the loss of BMV land. Whilst sites of lesser agricultural land quality may be of lesser scale, there may be the potential to meet need on a number of smaller sites, rather than opting for a single larger site that includes more BMV land, such as this. As discussed earlier in the report, the review within the emerging Plan process may well identify further urban sites within Hemel Hempstead, which would reduce the need to develop sites of a higher agricultural land quality.

9.236 DBC’s Local Plan Interim Sustainability Appraisal Report (SA) (2020) also identifies the significant effects on agricultural land (see p41-45) associated with this site. The SA explains that this was carefully considered against other objectives for these sites as well as alternative sites. Furthermore, the provision of large areas of open space would help to *‘mitigate the impact that the development would have on this particular objective.’*

9.237 It is acknowledged that few single sites across the Borough would be able to provide the proposed quantum of development without resulting in the loss of agricultural land. Whilst a range of sites have been considered as part of the draft Plan, further investigations into the development of existing urban areas may well reduce the pressure to develop BMV agricultural land.

Fragmentation

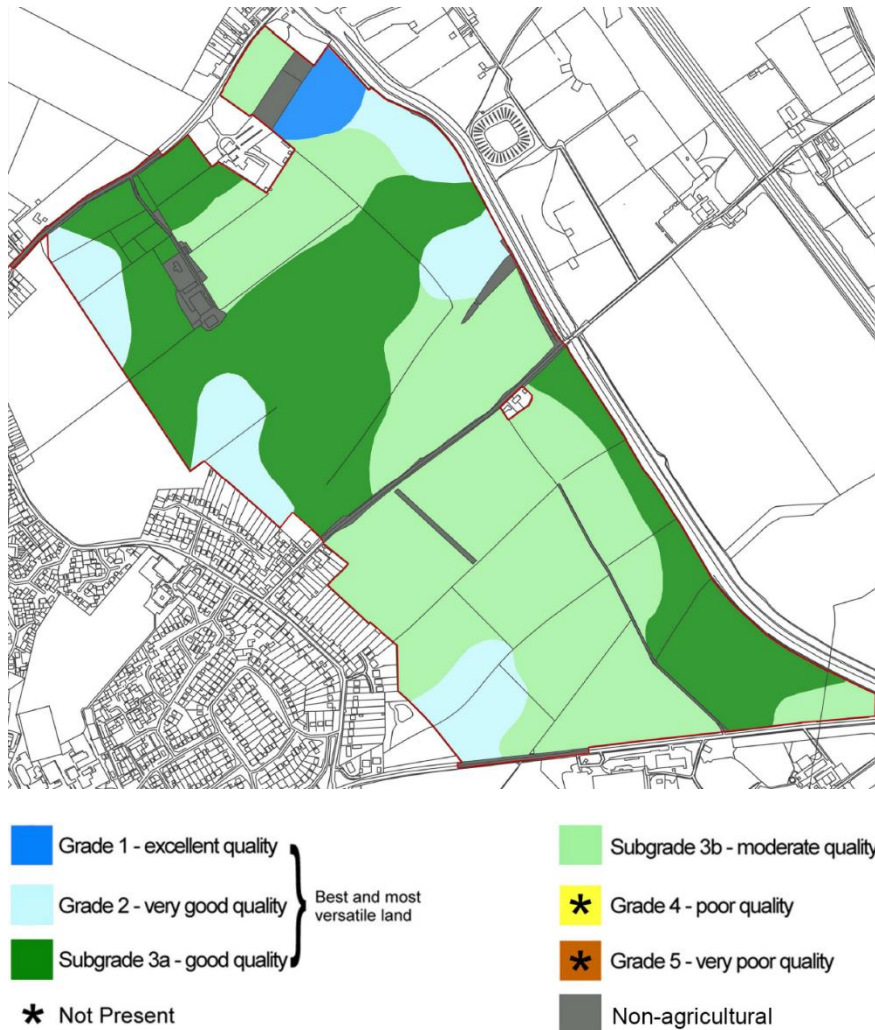
9.238 Saved Policy 108 also seeks to ensure that development does not fragment farm holdings. This point was raised with the Agent, who clarified that the *‘development will not lead to the fragmentation of any farm holdings – those farm holdings that are on the site will simply cease to exist when the development takes place.’*

9.239 The above clarifies that there would be no fragmentation of farm holdings.

Assessment

9.240 In the proposed scheme, 49% of the land, circa 59ha, is considered BMV quality (grade 1, 2 or 3a – see below) and will be subject to development.

Figure 5 – Agricultural Land Classification



9.241 The Environmental Statement identifies that the magnitude of change is major, resulting in a direct, permanent, major adverse effect on agricultural land and food production. No measures have been identified that would mitigate the direct loss of agricultural land but it is highlighted that the proposed design provides 27ha of SANG located along the eastern boundary that coincides with the area of BMV land and better quality soils.

9.242 The Statement also explains that there would be the retention and enhancement of existing areas of green infrastructure and incorporation of areas of new planting and retention of existing trees. Further, landscape areas would include allotments, SuDS, orchards, amenity green space, parks, gardens, natural and semi-natural green space, outdoor sports facilities and play areas. The Statement explains that the soil resources will be available and used to meet these different functions and uses.

9.243 Although identifying that there are no universally applicable measures available to mitigate the direct loss of agricultural land, the Statement suggests a 'Soil Resource Management Plan' (SRMP) condition could be added if the application is approved to alleviate some of the impacts on soil resources. The SRMP would confirm the different soil types; suggest the most appropriate re-use and methods for handling, storing and replacing; and help to re-use displaced soil resources.

9.443 Whilst it is acknowledged that there would be a loss of agricultural land, the development proposals position the SANG on the BMV land and better quality soils to reduce disturbance in these areas. The Illustrative Masterplan does show a number of large SuDS features situated

within the SANG area and therefore the creation of these features are likely to result in soil disturbance. However, the use of an SRMP, if approved, would help to reduce these impacts.

9.444 Overall, the loss of agricultural land is regrettable and would have some negative impacts, as previously identified. However, when viewed against the requirement for new housing and the other economic and social benefits that would arise from this development (e.g. employment, housing and education – see Section 6 of the Environmental Statement for full list of socio-economic benefits) it is not considered significant enough to warrant a reason for refusal.

Ecology and Biodiversity

9.445 The application is supported by two Ecological Assessments, which split the site into the northern and southern parcels due to its scale. The Assessments explain that a number of surveys were undertaken between 2017-2020 in relation to bats, badgers, otters, water voles, dormice, breeding and wintering birds, reptiles and great crested newts.

9.446 Further information relating to ecology and biodiversity is provided within the Biodiversity Net Gain (BNG) assessment, Landscape and Biodiversity Management Strategy, Environmental Statement (Section 9) and other documents previously mentioned in relation to the HRA.

Planning Policy

9.447 The Framework, Section 15 (Conserving and enhancing the natural environment), discusses ecology and biodiversity, stating that planning decisions, amongst other things, should minimise impacts on and provide net gains for biodiversity including by establishing coherent ecological networks most resilient to current and future pressures.

9.448 Policy CS26 states that development and management action will contribute towards: the conservation and restoration of habitats and species; the strengthening of biodiversity corridors; the creation of better public access and links through green space; and a greater range of uses in urban green spaces.

9.449 Policies NP1, CS2, CS10 and CS29 also ensure that development proposals improve the environment, regard environmental assets, preserve and enhance green gateways and wildlife corridors and minimise impacts on biodiversity whilst incorporating positive measures to support wildlife.

Assessment

Statutory and Non-Statutory Sites

9.500 There are no statutory designated sites within or directly adjacent to the site. The closest sites are: Tring Reservoirs SSSI circa 0.7km north-west of the site; Aldbury Nowers SSSI approximately 0.9km to the north-east of the site; and Tring Park SSSI around 1.1km south-west of the site. As previously mentioned, the Tring Woodlands SSSI and Ashridge Commons and Woods SSSI are circa 2.4km and 3km from the site, respectively.

9.501 Turning to non-statutory designations, there are two that lie adjacent to the site, the Grand Union Canal (Bulbourne to Tring Station) Local Wildlife Site (LWS) and Station Road / Grove Road Fields LWS. College Lake LWS is also situated within close proximity to the site, some 0.2km northeast of the site.

9.502 The Ecological Assessment states that it is not likely that there would be any adverse direct effects on the above-mentioned sites. However, similarly to the CBSAC, there is potential for adverse indirect effects through increased recreational pressure and other sources e.g. air quality

and hydrological effects. The Assessment goes on to explain that the proposed SANG would help to avoid adverse effects on the above-mentioned sites through increased recreational pressure, as it would deter visitors from visiting the protected sites.

9.503 The Assessment explains that the layout and design of the proposals have had regard to the value and location of the LWSs. Further, the submission for a CEMP, secured by condition, would ensure that potential adverse effects (e.g. run-off during construction) are minimised. A lighting plan condition could also be added to ensure that the LWSs are satisfactorily protected from light spill.

9.504 The canal corridor LWS and proposed built development are separated by a sizable area of SANG. It is unlikely that, with the imposition of the aforementioned conditions, that there would be any significant impacts on this LWS.

9.505 Turning to the Station Road / Grove Roads Fields LWS, the proposed Development Framework Plan indicates that residential use would be located c. 20-25 metres from the LWS boundary. There is a hedgerow buffer between the sites and the proposals indicate an open space 'buffer zone'. Whilst not as significant as the proposed separation distance to the canal corridor, it is considered that appropriate layout, design, lighting and construction management, secured through reserved matters and conditions, would safeguard the LWS. It is noted that specific concerns have not been raised in relation to the LWSs by the County Ecologist in their final response. Taking this all into account, the proposals would have an acceptable impact on the adjacent LWSs.

On-Site Ecology

9.506 There are a number of existing habitats on the site, which are detailed in Section 5 (Ecological Evaluation) of the Ecological Assessment. The ecological features comprise a number of hedgerows, arable land, improved grassland, tall ruderal, woodland, wooded belts, individual trees, scattered scrub, buildings, orchards and two ponds. The locations of these features are visible on drawing 'ECO2', within the Assessment. The habitats within the site are generally defined as of 'low ecological interest'.

9.507 A number of surveys were undertaken including a desk study, habitat survey, faunal survey and surveys for bats, badgers, otters, water voles, dormice, birds, reptiles and amphibians.

9.508 No evidence of badgers, hedgehogs or dormice was recorded during the surveys undertaken. However, despite no evidence being recorded, the Assessment highlights that the site does provide some suitable opportunities for foraging, dispersal and hibernation. Whilst it is unlikely that otters would use the site for foraging, the Assessment indicates that given the close proximity to the Canal, the potential future presence of otters along the eastern boundary cannot be ruled out. Regarding water voles, it is concluded unlikely that they would be present due to existing disturbance from walkers and boats.

9.509 The site supports suitable nesting and foraging habitats for a number of common bird species. A range of species were recorded during the relevant surveys, including a barn owl.

9.510 No reptiles or amphibians were recorded within the two ponds on-site. These ponds were identified as 'below averaged' and 'poor' on the Habitat Suitability Index for their ability to support great crested newts.

9.511 The Assessment identifies that given the habitats present, it is likely that the site would support an assemblage of common invertebrates. However, the majority of the site is arable land, which is of little value to these creatures. Further, there was no evidence that any notable species would be present.

9.512 The loss of habitat and opportunities for wildlife has been identified. However, the surveys indicate that there would be no loss of, or harm to, designated habitats or protected species.

9.513 A range of mitigation measures are proposed, for example, owl nest boxes, hedgehog gateways, creation of new habitat and a sensitive lighting scheme to reduce potential impacts. Notably, a significant area of SANG is proposed, which would, in time, offer new habitats. The scheme also proposes to retain the existing hedgerow and tree network and strengthen biodiversity corridors within the site and provide an overall 'biodiversity net gain' (BNG).

9.514 HCC Ecology have reviewed the proposals and initially raised some concerns over protected species. However, after further investigation they noted that the buildings proposed for demolition have been identified as having negligible potential to support roosting bats. They have also explained that whilst there are trees identified as having potential to support roosts, these do not appear to be directly affected by felling or pruning. These trees can be seen on 'Plan ECO2 – Ecological Features' in the Ecological Assessments for both northern (Document 26a) and southern (Document 26b) parcels. Consequently, there is no need for further bat surveys at this stage. HCC stressed the importance of a lighting strategy that takes account of the identified trees and also associated commuting and foraging areas. A condition would be added in this regard if the application is approved.

9.515 HCC Ecology also originally raised some concerns over the ecological mitigation measures, stating that they were limited. They also noted that the opportunities and constraints provided by the orchard to the north should play a greater role in the design and assessment of biodiversity, landscape and access provision. HCC Ecology echoed the Hertfordshire and Middlesex Wildlife Trust's (HMWT) comments, which requested the inclusion of a Biodiversity Net Gain Management Plan (BNGMP) condition ensure that existing and proposed foraging areas are sufficiently managed. If this application is approved further ecological mitigation measures should also be secured through a separate or combined Landscape and Ecological Management Plan (LEMP) condition, a condition capturing the mitigation measures in the Ecological Assessment and the inclusion of further swift and bat boxes as requested by HMWT.

9.516 Overall, HCC Ecology concluded that the proposed mitigation and illustrative landscape proposals would provide an overall benefit to biodiversity. However, it was requested that the ecological mitigation and the integration of these proposals with net gain and SANGS be captured through the above-mentioned conditions.

Biodiversity Net Gain

9.517 Paragraph 180 (a) of the Framework specifically advocates a hierarchical approach to biodiversity mitigation – the principle that on-site biodiversity loss should be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated and, as a last resort, compensated.

9.518 As above, the Framework suggests that biodiversity loss should be avoided through locating the proposals to an alternative site with less harmful impacts. Similarly to the pressures on BMV agricultural land, when considering the stage of the emerging Plan and the search for further urban sites, it is not clear whether alternative sites with less harmful impacts exist.

9.519 A 'Biodiversity Net Gain Assessment (Revision A)' has been submitted to accompany the other ecology/biodiversity documentation. The documents indicate that net gains in-line with the requirements of the Environment Act 2021 would be provided.

9.520 The Applicant has liaised with Natural England and in summary, it has been agreed that 'basic SANG' i.e. any improvements to the land necessary to meet the basic recreational

requirements of SANG quality cannot be counted towards the net gain score, whereas the provision of SANG habitats of greater ecological value, can. Taking this into account, two metrics have been produced.

9.521 A 'Mini Metric' has been produced to runs calculations based only on habitats and hedgerows within the proposed SANG area. This metric is designed purely to satisfy the basic requirements of SANG. These habitats are functional, providing the variety and structure to meet the requirements for SANG to be attractive for recreation, but not to maximise ecological interest and wildlife opportunities.

9.522 A 'Main Metric' has then been produced to provide SANG habitats of greater ecological value and also includes habitats within the application site that lie outside of the proposed SANG and which wholly contribute towards BNG.

9.523 The Mini Metric 'baseline' of habitat and hedgerow units was then subtracted from their counterparts in the Main Metric to subsequently establish a BNG calculation. When using this methodology, the proposal would provide a resultant net gain of 96.61 habitat units (34.85%) and 0.58 hedgerow units (0.65%) between pre and post development.

9.524 The Biodiversity Net Gain Assessment (Revision A) (July 2022) highlights that the site has a strong existing hedgerow network and the majority of this is to be retained, allowing for small losses for access, but the relative abundance of existing hedgerows means there are limited opportunities to establish new ones on wholly new lines.

9.525 The proposed scheme aims to provide the BNG uplift through the provision of a variety of habitats including woodland, orchards, meadow, amenity lawn, scrub, allotments, swales and areas of permanent and ephemeral water. In addition, semi-mature tree planting will also be undertaken within the proposed residential areas and a predominantly native seed mix used throughout the proposed habitats. It is envisioned that these habitats would provide floristic diversity across the site that would in turn, attract a greater diversity of invertebrates, provide nesting and foraging opportunities for bats and increase foraging and dispersal opportunities for birds. Full details of the BNG proposals can be found in Table 4.5 of the Biodiversity Net Gain Assessment (Revision A) (July 2022).

9.526 HCC requested the submission of the underpinning BNG spreadsheets, explaining that until such time it is, the outcomes of the BNG report cannot be relied upon. Both the Main Metric and Mini Metric spreadsheets were submitted to the LPA on the 21.09.22. Comments were received from HMWT and HCC Ecology, explaining that the metric shows an acceptable net gain in terms of terrestrial habitats but not in hedgerows. It was therefore requested that hedgerow provision delivering a 10% net gain in linear habitats be secured.

9.527 As mentioned earlier, a BNGMP condition was recommended to secure the habitats outlined in the metric. It was noted that the Landscape and Biodiversity Management Plan alone would not be sufficient, as there is no obligation to provide the requisite number of habitat units. Therefore the Agent was contacted and they confirmed that the 10% net gain in hedgerow units could be included as a requirement in the BNGMP condition.

Summary

9.528 The proposals indicate an overall increase in BNG primarily through habitat creation. The proposed legal agreement confirms a minimum of 30% BNG. This is substantially above the 10% requirement discussed in the Environment Act 2021. The proposed BNG would be likely captured through conditions relating to Landscape and Ecological/Biodiversity Management Plans and a BNGMP in conjunction with the legal agreement, should the application be approved. A specific condition requesting swift and bat boxes could also be imposed, as requested by HMWT.

9.529 The proposed uplift in biodiversity is considered as an attribute of the scheme and exceeds policy expectations. The proposed conditions appear to have broadly satisfied HCC Ecology and HMWT in terms of BNG delivery and ecological impacts. As such, no objection is raised in relation to the impact on neighbouring LWSs or on-site ecology.

Existing Trees and Vegetation, Proposed Planting and Landscaping

Planning Policy

9.530 The Framework, para. 131, identifies that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning decisions should ensure that new streets are tree-lined unless there are clear, justifiable and compelling reasons why this would be inappropriate. Further, opportunities should be taken to incorporate trees elsewhere e.g. parks and community orchards. Appropriate measures should be in place to secure long-term maintenance of newly planted trees and retain existing trees wherever possible. Section 15 of the Framework also discusses the character and beauty of trees and woodland and seeks to retain ancient and veteran trees.

9.531 Local policies in the Core Strategy (Policies CS13 and CS13) and Local Plan (saved Policies 99 and 101) seek to preserve woodlands, trees and hedgerows and provide suitable replacements if their loss is justified; provide planting to help assimilate development and softly screen settlement edges; encourage living walls and soft landscaping; and give consideration to existing and proposed trees to ensure that harmonious relationships exist with new developments.

Assessment

Existing Trees

9.532 The existing trees are identified within the Tree Report (Document 25i) and the proposed tree work is captured within the Arboricultural Report (Document 25). To summarise, the proposal would result in the removal of two horse chestnut trees of which one is category B and one is category C. Category B trees are considered to be of moderate quality within the region of 20+ years life expectancy and category C with 10+ years useful life expectancy. The proposals also involve the removal of some boundary hedging (groups G107, H161 and G157) to allow for proposed pathways, road surfacing and visibility splays.

9.533 The Trees and Woodlands Team have reviewed the proposals and believe that the proposed trees works are considered appropriate when considering the overall size of the site and the opportunity to mitigate the loss through the planting of urban trees and trees within the SANG. The Arboricultural Report explains that considering the number and density of category 'B' trees along the southern boundary, the removal of just one higher category tree is considered positive and would result in an overall 'low-key' impact on the boundary as a whole.

9.534 Some further tree works are required to accommodate the proposed accesses, such as the lifting of four sweet chestnut tree canopies above the proposed road on the southern boundary and the above-mentioned hedgerow works.

9.535 The scheme appears to have been designed with trees in-mind, resulting in an overall minimal loss of trees and hedgerows, particularly when considering the scale of the site. No objection has been raised by the Trees and Woodlands Team but they have requested further information on proposed planting by way of an 'Urban Planting Scheme' condition, if approved. They highlighted that the planting scheme species choice should take account of climate change and offer opportunities of shade in public areas. In addition, information relating to the SANG

planting should be sought and take into account protection from animal damage through species choice and guarding/fencing where appropriate.

9.536 Lastly, the Trees and Woodlands Team requested a programme of continued tree maintenance in perpetuity of the development to ensure that all existing and proposed trees and supported.

Proposed Planting

9.537 The Design Code (Document 10) explains the provision of trees and other planting (e.g. shrubs and herbaceous planting) within amenity spaces, green corridors and play spaces. The Code also states that street trees would be provided within primary, secondary and tertiary streets as well as the mews and private drives. It is also envisaged that soft and hard landscaping would be integrated across the site.

9.538 The above principles are written into the Design Code and although at this stage full landscaping details (including on-going management and maintenance) have not been provided, this element of the proposal could be secured by condition if the application is approved.

9.539 As previously discussed, DBC employed an external company 'HDA' to undertake an assessment of landscape impacts and a review of the submitted Landscape and Visual Impact Assessment. The response, dated 22.08.22, highlights that additional structural tree planting is required to assimilate the development into the landscape. It was suggested that a stronger landscape structure be provided, particularly in a north-south alignment. It was also suggested that large-scale native species should be planted in this respect. HDA explained that the above should be secured within the Landscape and Open Space Framework parameter plan in order to provide certainty, as concerns were raised that trees, particularly large species, should be planned from the offset to ensure sufficient spacing with buildings, roads, etc. The Applicant did not respond to the above requests above and therefore it is considered necessary to impose a conditions relating to the internal landscape structure as mentioned earlier in paragraphs 9.52–9.64.

Summary

9.540 The proposal would have a modest impact on trees and other vegetation when considering the large-scale nature of the site. Turning to the proposed planting, this is embedded within the design code, which highlights that a variety of trees would be provided across the site both within the urban areas and areas of open space. Although the proposed landscaping palette site is broadly acceptable, as raised in the 'Landscape and Visual Impact' section, concerns have been raised in relation to the internal landscape structure. This is due to uncertainty over the proposed mandatory street design principles and whether they would be sufficient to accommodate larger, structural planting. Concerns have also been raised in relation to the use of lime trees along the street corridors. Therefore, the landscaping proposals should be re-visited at reserved matters stage, or through condition, in-light of this.

Landscaping

9.541 The Design Code highlights that landscaping would be used throughout the development with substantial areas provided in certain areas e.g. the garden suburb core and the outer garden suburb and with some limited opportunities in other areas e.g. courtyards and mews. Full details of hard and soft landscaping would be sought by condition, if approved.

9.542 As above, HDA noted a number of concerns regarding the landscape and visual impacts associated with the development. Certainty over the internal landscape structure is required to mitigate these impacts, as the proposed street design principles may result in routes that are

unable to accommodate larger tree species due to verge widths and proximity to buildings. It is therefore suggested that, if approved, a condition be added to provide further details on landscape structure in consultation with DBC's Trees and Woodlands Team and HCC Highways to ensure that the street design principles are sufficient.

9.543 With the addition of a hard and soft landscaping scheme condition and further details regarding internal landscape structure and appropriate street design principles, which could also be captured via condition, it is felt that a high quality landscaping scheme could be provided and therefore policy-compliant in this regard.

Flood Risk and Drainage

9.544 Flood risk and drainage are assessed in the 'Water Resources and Flood Risk' chapter of the submitted Environmental Statement (Chapter 15), which contains detailed considerations pertaining to matters relating to flooding, surface water drainage, foul water drainage and water resources.

9.545 This has been supported by a Flood Risk Assessment (FRA) (Document 22, Revision A), Sustainable Drainage Strategy (Document 26, Revision A) and Utilities Statement (Document 9ii).

9.546 The potential hydrological impacts associated with the proposed development, during both the construction and operational phases, have been considered. These assessments and their conclusions are summarised below.

Planning Policy

9.547 The Framework, Section 14, states that when determining any planning applications, LPAs should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Core Strategy Policy CS31 echoes this approach.

9.548 Paragraph 169 of the Framework states that major developments are expected to incorporate SuDs with appropriate operational standards, maintenance arrangements and where possible, provide multifunctional benefits.

9.549 The Planning Practice Guidance identifies that new developments should be designed to provide adequate flood risk management, mitigation, and resilience against the 'design flood' for their lifetime.

9.550 This is a flood event of a given annual flood probability, which is generally taken as fluvial (river) flooding likely to occur with a 1% annual probability (a 1 in 100 chance each year), or tidal flooding with a 0.5% annual probability (1 in 200 chance each year), against which the suitability of a proposed development is assessed and mitigation measures, if any, are designed.

Assessment

9.551 The site is currently in agricultural use with few existing drainage features on site. These include a series of ditches, largely following field boundaries, the majority of which were observed as dry and therefore are likely informal land drainage. There are no public sewers within the site boundary.

9.552 There is a sizable embankment between the site and the canal and therefore any exceedance flows are expected to be maintained in the site. The Canal and River Trust (CRT) have not objected to the proposals. It is noted that they are not aware of any records of

overtopping or breach of the waterway adjacent to the site. HCC's Preliminary Flood Risk Assessment notes that there is no significant flood risk in Hertfordshire associated with canals.

9.553 The application site is located entirely within Flood Zone 1 (low risk) and there are no recorded historic incidents of flooding at the site. All potential sources of flood risk have been assessed. An assessment of a further range of potential risk sources including canals, groundwater, reservoirs, waterbodies and sewers has also been undertaken. None of these flood sources have been identified as posing a barrier to the development.

9.554 A Sustainable Drainage Strategy (SDS) (Document 26, Revision A) has been submitted with the application. It provides details on proposed run-off rates based on the predicted impermeable area created by the development proposals, including a 10% 'urban creep' buffer within residential parcels.

9.555 Surface water run-off would be stored within a series of infiltration basins along the eastern section of the site, within the SANG. The basins would be appropriately planted to provide a primary level of treatment through filtration, prior to the water infiltrating into the ground. The SDS recommends further levels of treatment through permeable paving, rain gardens and tree pits, which could be incorporated into the detailed design stage at reserved matters stage. It is highlighted that areas of permanent water within the basin would be provided to improve biodiversity.

9.556 Swales are also incorporated into the layout to convey surface water from the development into the above-mentioned SuDS basins – these would generally follow the edges of the proposed development parcels to incorporate them into blue/green corridors.

9.557 The proposed basins would not conflict with the easement for the oil pipeline, which runs through the site. However, the SDS notes that the pipeline would need to be crossed in several places to allow connections to be made between the swales and basins. The levels would need to be reviewed at the detailed design stage regarding the depth of the pipeline in addition to the proposed crossing point locations.

9.558 The British Pipeline Agency (BPA) have reviewed the proposals, stating '*we are pleased that the BPA pipeline appears to have been taken on board in the master plan with most of the housing designed away from the pipeline.*' No objection has been raised by BPA in relation to the proposals.

9.559 The proposals indicate that the drainage systems would be up for adoption by Thames Water but if any of the SuDS remained un-adopted, an appropriate maintenance company would be appointed.

9.560 A number of other flood risk mitigation measures would be incorporated into the design to reduce the risk of flooding. For example, finished floor levels of any new buildings would be raised to a minimum of 15cm above surrounding levels. Full details can be found in Section 4 of the FRA.

9.561 Regarding potential for groundwater pollutants, the SDS discusses the 'treatment train' incorporated to monitor and mitigate risk. This assesses the pollution hazard at a particular site, the effectiveness of SuDS treatment components in reducing levels of pollutants and the sensitivity of the receiving environment. It is proposed that SuDS Source Control measures would be implemented to manage water quantity and quality across the development. The SDS explains that a 'treatment train' stages would be determined through the detailed design stage, once the layout and drainage areas are fixed.

9.562 The Environmental Statement (Chapter 15) also comments on water resources and flood risk. It highlights that a Construction Environmental Management Plan is key to minimise effects on water resources and flood risk during the construction phase. It concludes that based on the information available, the effects are considered not significant when including appropriate mitigation measures.

9.563 The Environment Agency have reviewed the proposals and note that the proposed uses do not pose a high contamination risk, falling below their risk bar in terms of ground water and contaminated land. Similarly, as the site falls within Flood Zone 1, it falls below their risk bar for consultation in terms of flood risk.

9.564 DBC has commissioned a drainage consultancy (JBA) to review the proposals in absence of comments from the Lead Local Flood Authority. JBA have reviewed the drainage proposals are following the submission of revised and additional information, have not raised any concerns with the proposed drainage proposals. Final technical details have been provided by the Applicant and the LPA is awaiting JBA's confirmation that these details are appropriate. Members will be further update prior to committee in this regard.

9.565 A number of conditions would be required to ensure satisfactory drainage and flood prevention on the site. There would include a condition for the sustainable drainage strategy and a condition for timing, phasing, management and maintenance arrangements for the SuDS features and drainage network. The CRT have also requested an assessment of the impacts on the Grand Union cutting slope and reservoirs, any necessary mitigation measures and future responsibilities.

Foul Water Drainage

9.566 The application proposes to drain foul water from the development separately to surface water. New connections would be required to Thames Water's public sewer network. The SDS notes that at least one pumping station would be required, following a review of site levels.

9.567 Thames Water responded to the proposals and highlighted that they would not wish to restrict the development from being approved despite having concerns over current capacity. They stated that they would require a planning condition relating to a foul water drainage strategy if the application is approved. This would allow them to establish the proposed phasing plan with the Applicant and subsequently ensure that sufficient upgrades are made in relation to waste water so that the networks are able to accommodate the development within an agreed timeframe.

9.568 At this stage a timeframe has not been confirmed or agreed by either party. Therefore, this may have a bearing on the ability of the site to contribute to the five year housing land supply, should permission be granted.

Summary

9.569 Given the above assessment it is considered that, when the mitigation works detailed are taken into account, the proposed drainage strategy is deemed acceptable and no significant issues are identified relation to water resources or flood risk. Therefore, the proposal is considered acceptable in relation to Policy CS31 and Section 14 of the Framework.

Lighting

9.570 This application is in outline form and therefore detailed lighting strategy has not been submitted. The impacts of lighting, however, is discussed in various documents including the Environmental Statement.

Planning Policy

9.571 Saved Policy 113 of the DBLP permits exterior lighting, provided it, amongst other things, does not have a significant impact on the natural environment. In rural areas and other parts of the countryside, provision of new exterior lighting will be minimised.

9.572 Saved Appendix 8 of the DBLP explains that in the assessment of new proposals, the environmental impact of new exterior lighting will often be a material planning consideration. It highlights, amongst other things, that the strictest control over outdoor lighting is essential to maintain the dark landscapes of the open countryside and AONB – justification is therefore required for external lighting in these areas.

9.573 The Institute of Lighting Professionals (ILP) guidance notes should also be considered when assessing the impacts of light from proposed developments.

Assessment

9.574 The proposals would increase lighting both through construction and operational phases resulting in subsequent impacts on the landscape and natural environment. Whilst the Environmental Statement and LVIA highlight that the lighting would be seen in the context of the wider settlement, it identifies there would be some significant impacts from certain receptors.

9.575 HDA noted that the LVIA's assessment of the lighting effects recorded for the ILP Environment Zones recorded were fair. They noted that the Night Time views submitted at Appendix D.5 indicate that the eastern edge of Tring is generally unlit/relatively dark. The new housing and in particular and floodlighting would be noticeable, particularly in views from the east, and would bring light sources closer to the edge of the AONB. As such, HDA concluded that it is likely that the ILP Environment Zone would change as a result of the development. To combat this, structural planting was recommended, particularly to the east of any floodlit sports facilities. Whilst a standalone condition is not considered necessary in this instance, the provision of structural landscaping in these locations within the planting plans/landscaping conditions is of utmost importance.

9.576 The Environmental Statement explains that the exterior lighting would be designed in accordance with best practice. It also proposes a lighting strategy condition. The imposition of this condition would further help to alleviate the impacts caused by lighting across the development.

9.577 It is clear that the proposal would result in a significant increase in light when compared to what currently exists on site. This, in turn, would have knock-on effects on the surrounding environs, particularly when viewing the site in the dark. As the use of a lighting strategy would help to reduce these impacts to a degree, however, it is considered that there would still be harmful impacts, particularly on the Chilterns AONB. This has been discussed in the 'Landscape and Visual Impact' section of this report. Whilst impacts were identified, suitable tree planting and lighting strategy conditions are considered sufficient to help mitigate the impacts.

Ground Conditions and Contamination

9.578 The application has been supported by a Phase I Geo-Environmental Assessment, which has been used to inform the proposals. The report concludes that the site is suitable for the proposed use in terms of levels of ground contamination and ground conditions (geology), subject to further investigations to determine various things such as foundation design and contamination mitigation strategies.

9.579 DBC's Environmental and Community Protection Team has been consulted on the planning application. They have raised no objections to the proposals in terms of contaminated land at this

stage but requested an intrusive site investigation report via condition if the application is approved.

9.580 Taking the above into account and the further investigations that could be secured by condition, it is not considered that ground conditions or contamination would pose a significant constraint to the proposed development. The proposals are therefore considered to comply with Policy CS32 and the Framework in this regard.

Residential Amenity

Planning Policy

9.581 The impact on the established residential amenity of neighbouring properties is a significant factor in determining whether the development is acceptable and Paragraph 130(f) of the Framework states that developments should provide a high standard of amenity for existing and future users.

9.582 Policy CS12 states that, with regards to the effect of a development on the amenity of neighbours, development should avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to surrounding properties.

9.583 Saved Appendix 3 (Layout and Design of Residential Areas) requires new developments to provide sufficient space around residential buildings to avoid a cramped layout and maintain residential character. Spacing between buildings ensures privacy and allows movement around buildings for maintenance and other purposes.

Assessment

Neighbouring Properties

9.584 There are a number of residential properties on the edge of Tring within proximity to the site, including those on Netherby Close, Hollyfield Close, Marshcroft Lane, Ridge View, Grove Road, Orchard Gardens and Station Road. These properties are situated on the south-western boundary with the majority of the properties having their rear gardens backing on to the site. In terms of distances, it appears that the vast majority of neighbouring buildings would be sited over 60 metres from the proposed development.

9.585 The Illustrative Masterplan (ES Appendix: Illustrative Masterplan) and Parameter Plans (Document 4a, Parts 1-5) illustrate allotments and areas of vegetation to be used to create buffer zones between the existing and proposed properties. The proposals have also been designed to provide two-storey development adjacent to the aforementioned neighbouring properties to reduce overlooking and potential for loss of light (see Building Height Parameter Plan (HRE003-027 Revision C)). Private gardens would be closer, however, the buffer zones/distances are considered sufficient as to avoid any significant impacts.

9.586 There are several buildings within closer proximity to the proposed build development area (e.g. 1-4 Grove Farm Cottages and 5-9 The Grove on Marshcroft Lane). 9 The Grove, in particular, would be closest, being sited some 20 metres from the proposed development area. Saved Appendix 3 requires a separation distance of 23 metres between habitable room windows. At this stage the final layout has not been agreed and therefore should this application be approved, the orientation and layout of the proposed properties should be carefully considered at reserved matters stage.

9.587 There are other buildings adjacent to the site e.g. properties and garden centre on Bulbourne Road and Goldsworth Road (north western border), properties and buildings associated

with Pendley Manor on Station Road (southern border) and Marshcroft Cottages and Marshcroft House, which have been 'cut out' of a central part of the site. Considering the separation distances between these buildings and the proposed build form, it is not felt that there would be any significant impacts in relation to residential amenity.

Proposed Properties

9.588 At this stage the exact layout and orientation of the proposed properties has not been established. Therefore, an accurate assessment of residential amenity for future occupiers cannot be known. The proposals would be assessed in more detail at reserved matters stage in this regard, if the application is approved.

New Mill Proposals

9.589 Saved Policy 10 (Optimising the use of urban land) of the DBLP, whilst not strictly applicable to this development as it is not urban land, lays out some important principles to secure the optimum use of land in the long term. This includes: (a) all development must be planned and implemented in a co-ordinated way, taking a comprehensive view of potential opportunities in the immediate area wherever possible. This echoes the co-ordinated approach laid out in the emerging allocations (Tr02 and Tr03).

9.590 A letter dated 1st June 2022 was received from Pegasus Group on behalf of L&Q Estates, who have a commercial interest in the aforementioned neighbouring site, New Mill (Tr02). The letter highlights concerns that the illustrative masterplan has not been developed in conjunction with L&Q Estates. Nevertheless, they have requested that the parameters of the outline proposals ensure the emerging policy aspirations for the site primarily in terms of integration, movement, connectivity and phasing.

9.591 Specifically, the letter from the Pegasus Group requests that the LPA ensures that connections can be made between the sites should they both come forward. Questions are raised regarding the locations of certain facilities (e.g. the schools) and whether they could be more suitably located to benefit the wider area (including the New Mill site). Lastly, the letter requests consideration of the proposed phasing plan to ensure that community facilities such as the community/sports hub can be brought forward early in the project timeframe.

Connectivity to and from New Mill

9.592 A response from the Agent indicated that discussions had taken place between the Applicant and L&Q Estates and connections would be possible between the sites. Whilst these connections are not formally indicated on the Movement and Access Plan (Document 4a, Part 4) despite being requested by the LPA, an email from the Agent dated 06.09.22 confirmed that Harrow Estates are willing to commit to delivering foot and cycle connections to the western site boundary. They highlighted that the following obligation in the S106 Agreement would secure these connections:

'Future connections to land at New Mills

In the event that land at New Mills (draft allocation Tr02) is brought forward for residential development, of a form that is compatible with the development at Marshcroft, provision will be enabled for footpath and cycle connections between the two sites. Such connections to be designed and approved through the process of approval reserved matters for relevant development parcels.'

9.593 The Agent has clarified that the Draft Phasing Plan (Document 5b) identifies that the majority of the land adjacent to the New Mills site is earmarked for delivery towards the latter stage

of the development (phase 5), by which time it is anticipated that a decision on the New Mill allocation will have been made, thus enabling details of connections to be discussed between the relevant parties and agreed at reserved matters stage.

9.594 The application also confirms that the site is fully accessible and does not require any form of footpath or cycleway to be provided through the New Mill site. Therefore, should Tr02 not come forward or its delivery be substantially delayed, that it would not have an adverse impact on the sustainability of the application site.

9.595 Taking the above into account it appears that a satisfactory mechanism to ensure that connections to the New Mill site are provided can be secured through the proposed legal agreement and reserved matters stages. It is also clear that the proposal can come forward in isolation without any significant impacts on connectivity to the surrounding area.

Building Heights Adjacent to New Mill

9.596 It is noted that the proposals include “up to 3-storey (11m to building ridge)” development within close proximity to the New Mill site (see images below). There is a small buffer between the sites but of a lesser size when compared to the separation gaps provided for existing housing on the edge of Tring, where allotments have been provide greater separation (see Illustrative Masterplan). The Building Heights Parameter Plan (Document 4a, Part 3, Rev A) also proposes ‘up to 2-storey (9m to building ridge)’ adjacent to these existing sites.

Figure 6 – New Mill and Proposed Building Heights Juxtaposed



9.597 Although not raised as an issue in the Pegasus Group letter, the concerns above were raised with the Agent. They responded stating that the final layout (to be agreed through reserved matters) would be able to take account of proposals on the New Mill site. Whilst it is the view of the LPA that either greater separation distances should be provided or the building heights be reduced to a maximum of 2-storeys on the parameter plans, it is acknowledged that the LPA would be able to agree a suitable layout at reserved matters stage, ensuring that no adverse impacts would arise on the New Mill site. To avoid unacceptable impacts on residential amenity (e.g. overlooking or overbearing impacts caused by 3-storey development), mitigation could be sought, for example, by locating gardens/private amenity space toward the New Mill site or by satisfactory orientating the proposed units.

Healthy Communities - Open Space, Play Provision, Sports Facilities and Food Growing

Planning Policy

9.598 Paragraph 93 of the Framework requires planning decisions to provide social, recreational and cultural facilities and services the community needs, including the provision and use of shared spaces such as open spaces.

9.599 Paragraph 92 (c) highlights explains that planning decisions should aim to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles for example through the provision of safe and accessible green infrastructure, sports facilities, access to healthier food, allotments and layouts that encourage walking and cycling.

9.600 Paragraph 98 emphasises the importance of providing a network of open spaces and opportunities for sport and physical activity.

9.601 Saved Policy 76 (Leisure Space in New Residential Developments) explains that residential developments of over 25 dwellings will not be granted planning permission unless public leisure space is provided. This open land should be provided at a standard of 1.2 hectares (3 acres) per 1000 population or 5% of the development area whichever is greater and should be useable, well located and purposefully designed. Major Developments will also be required to contribute to other recreational needs of the development such as off-site provision of sports pitches or enhancements to other open spaces.

9.602 Saved Appendix 6 provides further detail on requirements for open space and play provision and requires the consideration of the National Playing Fields Association (NPFA) standards with a total of 2.8 hectares per 1,000 population; including: 1.6ha of adult/youth play (including pitches, 0.6ha for children's play over 5's, 0.2ha for under 5's and 0.4ha for additional leisure space.

9.603 In 2019, DBC commissioned and published several documents including: Open Space Standards Paper (OSSP) (2019); Playing Pitch Strategy and Action Plan (2019); and the Indoor Leisure Facilities Needs Assessment (2019) to provide an evidence base for the emerging Plan and provide direction to inform decisions on future strategic planning. The OSSP uses Fields in Trusts (FIT) standards for assessing current provision and existing deficits in the quality and quantity of play spaces and parks and gardens in the Borough.

Assessment

Open Space

9.604 The application site is approximately 121 hectares. Based on the standard above, an approximate total of six hectares of open land would be required in association with this scale of development, which equates to around 5% of the development area. The Sport and Physical Activity Facility Strategy (Revision A) (Document 21) highlights that the proposals would provide 64.20 hectares of open space, with an overall figure of 22.02 hectares of amenity space, parks and gardens and adult/youth spaces.

9.605 The Strategy explains that the Applicant has had regard to the findings in the OSSP paper, ensuring that the proposed locations of each open space type meet the FIT accessibility guidelines in terms of distance and walking time.

9.606 The Design Code explains that a variety of parks and gardens would be provided across the development, each with their specific context. The Design Code, pages 34-52, discusses the range of spaces provided, including a woodland linear park, heritage garden, community allotments and a range of other spaces. Some parks and gardens would function as destinations whilst others forming part of a larger open space framework. A number of mandatory design principles are captured in the Code, for example, all parks and gardens would include a variety of planting, integrate biodiversity benefits and ensure there is passive natural surveillance (see p.33-34 for full list of principles).

9.607 A new tree-lined street would extend north from Station Road to Bulbourne Road. Criss-crossing this 'green spine' are a number of green open spaces/green wedges that open out towards the canal corridor and wider rural landscape.

9.608 The masterplan appears to provide substantially more open space than required by local policy, which is welcomed. The landscape and open space framework has been purposefully designed to provide green corridors and a range of open spaces in sensible locations.

Play Provision

9.609 Turning to play provision, saved Policy 76 requires usable, well located and purposefully designed play equipment. The scheme provides three Local Equipped Areas for Play (LEAPs), which provide an unsupervised area equipped for children of early school age and within five minutes from home. One larger Neighbourhood Equipped Area of Play (NEAP) would be provided in a more central location. This would provide a larger range of play equipment, primarily for older children but with play opportunities for younger children as well.

9.610 The 'Play Spaces' map in the Design Code (p.50) illustrates that no proposed property would be more than 400 metres from a play space, with the NEAP being less than circa 800 metres from the majority of the site. As such, the FIT guidelines would be met in terms of buffers from residential development.

9.611 The Code explains that these formal equipped play areas would be complemented by natural and informal play opportunities distributed across the development. The Code provides 17 mandatory design principles regarding the design and specifications of the play areas. Point 17 notes that Local Areas of Plan (LAPs) would also be provided across the development. Overall the principles are considered appropriate, however, further details of the design specifics and play equipment would be required at reserved matters stage or by way of condition.

9.612 The proposed play provision are considered sufficient in providing play areas and play opportunities for the needs of the future residents. As such, no objections are raised to the proposed play strategy.

Sports Provision

9.613 The Sport and Physical Activity Strategy (SPAS) (Revision B) sets out the FIT requirements based on a modelled population of 3,500 residents. This is based on a multiplier of 2.5 residents per dwelling.

9.614 Sport England have been actively involved in this project during the determination period. An amended SPAS and a further 'Technical Note' (Revision B) (Document 21a) was received in response to dialogue between Sport England and the Applicant.

9.615 The Applicant has used the Sport England 'Sports Facility Calculator' to calculate the expected demand from the development, as they note that the emerging Plan requires an assessment against the 'Playing Pitch Calculator'. It is worth noting that any provision on the primary school site is excluded from the calculations – this is because the pitches most likely would not be available for general community use.

9.616 It is also worth noting that in certain circumstances the Applicant has agreed offsite contributions in liaison with Sport England and other relevant sporting bodies. For example, it was considered preferable to provide an off-site contribution to specific improvements at Tring Rugby Union Football Club rather than provide facilities on-site, which would be divorced from the main rugby facilities in Tring and therefore may not be used to their full potential.

9.617 The following tables summarises the FIT and Sport England playing pitch requirements against the proposed provision.

Table 5 – Fields in Trust Sports Requirements vs Proposed Provision

	FIT Requirements for 3,500 Population	Proposed Minimum Provision
Playing Pitches Only	4.2ha	5.2ha
All Outdoor Sports	5.6ha	5.8ha

Table 6 – Sport England Playing Pitch Calculator Requirements vs Proposed Provision

Type	Sport England Playing Pitch Calculator		Proposed Minimum Provision	Comment
	Match Equivalent Sessions	Pitches Required		
Adult	0.90	1	3	
Youth	1.61	1	2	
Mini	1.52	1	2	
Rugby	0.36	<1	0	Off-site provision
Cricket	30.86	1	1	
Hockey	0.21	<1	0	Off-site provision
Football Training	8.06 hours per week	1 (if 3G)	5	

(It is worth noting that the cricket figure above is an anomaly as the cricket demand is reported in the Sport England calculator as 'match demand per season' not per week like football.)

9.618 The SPAS (para 8.10) highlights that, in summary, that the Applicant commits to the funding and development of the following outdoor sports facilities:

- 1 x floodlit senior 3G pitch;
- 2 x grassed mini-soccer pitches (7 x 7 – under 8s) on the Sports Hub site for community use only;
- 1 x grassed youth pitch on the Sports Hub site for community use only;
- Type 2 open porous macadam, floodlit, multi-use games area for tennis, netball and basketball on the boundary of sports hub site and secondary school site for dual use;
- 1 x grassed senior football pitch on the cricket site on adjacent site to secondary school and main Sports Hub; and
- 1 x grassed cricket oval and cricket pitch on additional site adjacent to secondary school and main Sports Hub.

Sports and Community Hub

9.619 The proposals also include a sports and community hub facility. The proposed facilities comprise:

- A Sports Hub building up to 1,600sq.m;
- Four-court sports hall with equipment store (to be included as part of the Sports Hub building);
- Sports pavilion of 150sq.m integrated into community building;
- Fitness/activity studio;

- 26 station gym facility with space for more stations subject to feasibility/demand study at reserved matters stage;
- Four changing rooms split between indoor/outdoor in the main Sports Hub building;
- Two outdoor changing rooms, clubhouse facilities and space for match officials as part of community building adjacent to cricket facility;
- Café/bar/social space for community and club access provided in the main Sports Hub building and as part of clubhouse/community building; and
- Community sports reception and separate secure access for secondary school.

9.620 The sports hub is provided adjacent to the secondary school and the SPAS (para 8.6) confirms that the design will enable dual access i.e. a separate access for the school. Paragraph 9.6 highlights that the sports hub would be designed and constructed to Sport England Community standards.

9.621 The SPAS explains that for certain sports e.g. bowls and squash, no additional provision or contribution would be provided. This is primarily due to an assessment of existing facilities and requirements/needs. For example, Squash is already well-catered for at Tring Squash Club. Justification is provided in Table 7.3 of the SPAS and this is considered sufficient.

9.622 The following sports contributions have been agreed using the Sport England calculator:

Off-site contribution for rugby (league and union) - £52,089 (pitches) + £134,209 (changing rooms).

Total: £186,298

Off-site contribution for hockey - £50,286 (pitches) + £20,902 (changing rooms).

Total: £71,188

Off-site contribution for swimming to improve Tring Sports Centre as no swimming facility is proposed.

Total £744,177

9.623 The overall off-site contributions equate to £1,001,663. These figures are reflected in the proposed legal agreement heads of terms.

9.624 The facilities detailed above appear to meet the requirements for the proposed development and exceed local policy requirements. Further financial contributions would be provided to compensate for any facilities not provided on site.

Dual Use of Sports Facilities

9.625 As previously alluded to, the proposed Sports Hub and Secondary School would be situated adjacent to each other. This would allow the dual use of the facilities to ensure that they remain financially viable. If this application is approved, the dual use arrangements would be established through a dual use agreement with the relevant parties.

9.626 As summarised in part 9 of the SPAS, dialogue with Hertfordshire County Council has revealed that although a suitable site must be reserved for a secondary school, at this present time it is unclear whether a new school would be built here dependant on future growth and demand in Tring. This means that the sports hub must be freestanding facility that is viable without any school users.

9.627 The proposed artificial pitch and floodlit hard-surfaced courts are located within close proximity to the proposed school boundary and therefore although these pitches/courts would be brought forward with the Sports Hub, they could provide resources for the school through a future dual use agreement.

9.628 Regarding the multi-use games area (MUGA), it is proposed that this would come forward earlier in the phasing with the Sports Hub but would become part of the secondary school site in the future. The dual use agreement could then be used to formalise community access to the MUGA outside of core school hours.

9.629 The SPAS also indicates that the indoor sports hub would be designed to allow full school access during core school hours and with community access outside of school hours. Separate entrances would be provided to ensure that adequate safeguarding can be provided once the school is operational.

9.630 In terms of management of the sports hub, the SPAS explains that the governance arrangements would depend on the timing and delivery of the school, however, there are options for a leisure trust, local authority, or the Academy Trust to take responsibility.

Management of Sports Facilities

9.631 Part 10 of the SPAS explains that there are three main options for operating the sports hub and associated facilities, including; in-house management by the LPA or county council; outsourced management via a private company or charitable trust; or establishing a new charitable or non-charitable trust.

9.632 Table 10-1 sets out a number of pros and cons associated with each potential management options, it would be down to the relevant parties to agree the preferred option should this application be approved.

Sports Facilities Summary

9.633 The updated SPAS has demonstrated that the majority of the additional demand for sports facilities generated by the proposed development would be met on site through the facilities proposed in the sports hub and the cricket ground with potential for the secondary school and the community centre to also make additional secondary forms of provision. For the facilities that would not be provided on-site, off-site provision would be made in the form of financial contributions towards the delivery of new/enhanced facilities on existing sports facility sites in the surrounding area. The approach to sports facility provision is therefore supported. This position is strictly subject to provision being made in any planning permission for the facilities to be secured, delivered and managed in practice and for the detailed design to be addressed as part of reserved matters applications. Sport England have requested a number of planning obligations and conditions in this regard (see their final comments). The obligations are included within the proposed HoTs and the relevant conditions would be added if the application is approved.

Food Growing - Allotments and Orchards

9.634 The 'Landscape and Open Space Framework' (Revision E) Parameter Plan, in conjunction with the Design Code (p.48-49), details the proposed locations and design principles for the proposed allotments. They are situated on the western edge of the site, between the existing settlement edge of Tring and the proposed housing. The Design Code highlights that the allotments would be for use by existing Tring residents, as well as future residents on the site, with an aim to encourage social interaction.

9.635 The proposals also include the opportunity for the creation of a new orchard (see Design Code, p40) and community wildlife garden (p.41) opposite the Bulbourne Road frontage, further details of which would be obtained at reserved matters stage if this application is approved.

9.636 The proposed orchards and allotments would provide an opportunity for food growing and encourage local food production and a healthy living environment. The proposals to provide an orchard would help address the decline of formal orchards, highlighted as a priority habitat in the UK biodiversity action plan requirements. The scheme's inclusion of community allotments, orchards and a wildlife garden are welcomed and would provide ecological and social benefits, in addition to providing food-growing facilities.

9.637 In terms of the on-going maintenance and management of these areas, certain mechanisms would need to be captured in the heads of terms for the S106 Agreement to ensure that this is satisfactorily handled.

Provision of Non-Residential Development – Community Facilities

9.638 The planning application is for a mixed-use development and, as such, proposes a range of other uses on top of the residential provision discussed previously. Policy CS23 encourages the provision of new services and facilities for the community to be located to aid accessibility and allow different activities.

9.639 Aside from the proposed housing, the following community facilities are proposed:

- 2 Form Entry (FE) primary school with room for expansion to 3FE;
- 6FE secondary school with sixth form and room for expansion to 8FE;
- Local centre with community buildings, shops and services and Sports Hub; and
- Health facility.

9.640 The proposed open space and sports facilities have already been discussed – the sections below will discuss the remaining community facilities proposed as part of the East of Tring development.

Planning Policy

9.641 Paragraphs 92 (a) and 93 (a) of the Framework require planning decisions to promote social interaction – for example, through mixed-used developments and plan positively for the provision and use of community facilities to enhance the sustainability of communities and residential environments. Furthermore, Paragraph 93 (b) and (e) require proposals to support the delivery of local strategies to improve health, social and cultural well-being and provide an integrated approach to the location of community facilities and services.

9.642 Core Strategy Policy CS23 – Social Infrastructure relates to the provision of social infrastructure within the Borough. The explanatory text of the policy outlines that this infrastructure includes education, health, community and leisure facilities. The policy states that new developments will be expected to contribute towards the provision of community infrastructure to support the development. In the case of larger developments, this could be in terms of the provision of land and/or buildings on site to accommodate required facilities or financial contributions towards off-site provision.

9.643 The requirement for new development to provide contributions towards the provision of on-site, local and strategic infrastructure required to support the development is set by Core Strategy Policy CS35 – Infrastructure and Developer Contributions. The policy outlines that contributions will be required unless existing capacity in relevant infrastructure exists and financial contributions will be used in accordance with needs set out in the Infrastructure Delivery Plan. This policy has

some overlap with the Community Infrastructure Levy, which has been adopted by the Council, and will be discussed later.

Education

9.644 The Education Infrastructure Assessment (Document 20, Revision A) sets out the education infrastructure needs that would arise from the development and provide an overview of capacity and forecasted pupils at nearby schools. The document then explains how the proposal would aim to meet the needs of the local area.

9.645 Paragraphs 5.7-5.8 note that primary pupil numbers have peaked nationally and regionally and are forecast to decline over at least the next seven years. ONS reported historic low birth rates in 2018-19 and this trend is predicted to continue. The data forecasts an overall reduction of 944,000 pupils across primary and secondary phases from 2022 to 2032. This may result in lower demand for school places from existing residential areas and may reduce the actual pupil yield from new developments.

9.646 Hertfordshire County Council, as the Education Authority, have been involved in this project and provided commentary and advice during the course of the determination period.

Existing Primary School Facilities

9.647 Tables 1-3 of the Education Infrastructure Assessment identify the capacity and forecasts for primary schools within a two-mile radius of the proposed development. These include a projected pupil demand based on housing developments expected in the area. Paragraph 6.6 explains that within two-miles, which is the statutory travel distance for primary schools, there is a modest surplus of 51 spaces (3.7%) across all of the schools, however it is noted that three of the schools are less than two forms of entry and it is unclear if they could or want to expand. Demand for reception places is forecast as steady up to 2025-26.

Existing Secondary School Facilities

9.648 Section 7 highlights that there is one secondary school (8FE) within three miles of the development site, which is the statutory travel distance for secondary schools. Tables 4-5 set out the available surplus, which is -38 places, or -2.5%; and the forecasts until 2031. The forecasts predict that as Tring School appears to be operating at close to capacity, any large and sustained demand for additional secondary school places over the longer term may not be able to be accommodated, even by expanding Tring School, if this is/were possible.

Predicted Pupil Yield

9.649 Hertfordshire County Council uses the Hertfordshire Demographic Model as a methodology for estimating pupil yield from a development and for informing recommendations to LPAs for developer contributions. The model calculates yield using input data on the dwelling mix, mix of tenure and likely build-out rate.

9.650 Two scenarios have been provided based on different dwelling mixes with scenario 1 detailing a larger proportion of family units (with the potential to include school-aged children); when compared to scenario 2, which includes the elderly person's accommodation, which would not generate any pupil demand. The modelling provided the following long-term average demands:

Table 7 – Predicted Pupil Yields

	Scenario 1		Scenario 2	
	Primary	Secondary	Primary	Secondary

Long-term avg. demand (FE)	1.21	1.18	1.10	1.06
Peak demand (FE)	2.44	2.38	2.08	2.03

Physical Requirements

9.651 The Education Infrastructure Assessment has considered both the Department for Education (DfE) and HCC's guidelines for site areas. HCC's guidelines suggest a large difference above the DfE standards. The Assessment also references pre-planning advice from HCC, where requests were made for potential expansions of the schools (up to 3FE primary and 8FE secondary schools).

9.652 The Applicant has confirmed (see para. 11.9) that it is willing to provide sites in accordance with HCC's guidelines, enabling expansion if required. As such, site areas of 2.92ha for the primary school and 10.78ha for the secondary school are available.

Timescales and Delivery

9.653 Based on anticipated pupil yield and existing/future circumstances, the current primary schools would have some surplus capacity to cater for early stages of the development. Regarding secondary schools, forecasting projects that additional secondary school provision would be required during early years of the development.

9.654 The timescales and milestones would be captured in the S106 Agreement. Whilst this is relatively simple for the 2FE primary school, the timing and phasing of a secondary school is more complicated, as it would require a critical mass of new pupils entering year 7 each year to remain viable.

9.655 The Applicant has committed to providing serviced primary school site and a financial contribution towards its construction. A commitment has also been made to reserve a serviced site for the secondary school for a period of ten years following commencement of the development and a financial contribution towards any secondary school places required as a direct consequence of the development. Full details are set out in the proposed HoTs.

Response from Education Authority

9.656 The latest response from HCC as the Education Authority sets out the following:

'You'll be aware that any previous requirement expressed by HCC for new primary and secondary schools within Tring, was based upon the November 2020 Regulation 18 Draft Dacorum Emerging Strategy for Growth Local Plan (2020-2038). This draft plan contained a delivery strategy for the settlement that aimed to deliver 2,730 dwellings during the plan period. This took the form of three growth areas that would deliver the bulk of these dwellings (East of Tring: 1,400 dwellings, New Mill: 400 dwellings and Dunsley Farm: 400 dwellings). The delivery strategy included the provision of a new secondary school and two new primary schools and was supported by the county council in principle in our response to this consultation in February 2021.

Since this consultation took place, Dacorum Borough Council has decided to revise the overall growth strategy for the borough. The borough council has indicated that a revised regulation 18 draft local plan with a new set of individual settlement delivery strategies will be published for consultation in June 2023, meaning that the current delivery strategy for Tring remains unclear. The county council cannot therefore continue to support the level of primary and secondary school provision that was suggested for Tring within the November

2020 draft local plan, until a revised development strategy for the settlement is published by the borough council.'

9.657 The Education Authority have modelled the proposed development against the Hertfordshire Demographic Model, which projects the average number of children likely to emerge from different types, sizes and tenures of housing over time.

9.658 The response further states:

'At 1,400 dwellings, the modelling suggests that the peak pupil yield arising from this scheme is approximately 2.4fe in 2036 for primary and approximately 2.3fe in 2042 for secondary. This equates to an estimated 497 primary school pupils and 343 secondary school pupils). The modelling is on the assumption that construction commences in 2023 and the first dwellings are occupied in 2025. It also suggests that the pupil yield is sufficient to justify the allocation of land for a new primary school within the application site and this is supported in principle by the county council.

However, it is considered that the need for a new secondary school has not been established by either the estimated pupil yield being generated by the development or the appropriate progression of the local plan. This means the county council cannot agree to any timeframe for the opening of a new secondary school due to the uncertainty surrounding the commencement of this development (if approved) and any other sites that may (or may not) come forward within the Tring area.'

9.659 The Education Authority requested an unconstrained delivery programme to allow them to bring forward the school as and when it is needed at an appropriate scale/form for any growth coming forward in Tring. The Applicant has not agreed to this and their proposed HoTs states that if the secondary school is not constructed on the site within three years of the payment of the final instalment of the secondary school contribution, then the council shall transfer the secondary school site back to the owners.

9.660 It is considered reasonable to set a timeframe for the delivery of the school. However, the proposed development in isolation does not appear to yield sufficient pupils to make a new secondary school deliverable or sustainable.

9.661 The Education Authority note that the expansion of Tring School with a split-site solution might be a more appropriate and deliverable option should growth be more limited in the town. However, a serviced site would still be required and timescales are presently unknown.

9.662 The 'Existing Secondary School Facilities' section above explains the limited availability in local schools in the area. Whilst it appears that a satisfactory outcome may be reached in relation to primary education, there are current uncertainties over the level of growth in Tring and the feasibility of providing a secondary school.

9.663 Paragraph 95 of the Framework identifies that it is important that a sufficient choice of school places is available to meet the needs to existing and new communities. LPAs are required to take a proactive, positive and collaborative approach to meeting this requirement. Thus, great weight should be given to the need to create, expand or alter schools.

9.664 The LPA has been proactive in arranging meetings between the Applicant and Education Authority through the course of this application. Due to the reasons above, an agreement relating to secondary education has not yet been reached between the parties. However, as indicated in the proposed HoTs, the Applicant is willing to transfer freehold estate of the secondary school site to the county council. The land would then only be handed back to the developer if HCC do not construct the secondary school within three years of the final education contribution instalment,

which is scheduled for on or before the occupation of the 1200th dwelling. The indicative phasing highlights that this would likely be at some point between 2028 and 2033 and therefore it is likely that HCC would have until 2031-2035 to construct the school. This timescale appears reasonable as it would provide a sufficient amount of time for the Education Authority (up to 13 years) to obtain the money and construct a new school or provide a split-site arrangement with existing school if needed, based on the levels of growth in Tring. As secondary school places are already limited, it is likely that LA5 and other development proposals would contribute to pupil yield for either of the options above.

9.665 It is also worth noting that the latest response from the Education Authority highlighted the requirement for larger contributions in relation of primary and secondary education, which appears to have been justified within their response. An agreement was made on the initial figure suggested by HCC but the Applicant has not yet agreed to these increased figures. It is noted, however, that the precise figure would be calculated at reserved matters stage, should this application be approved.

Health Facility

9.666 The proposed development falls within the existing practice boundaries of two GP surgeries in Tring, namely Rothschild House Surgery and The New Surgery, and another in Pitstone, Pitstone Surgery. All of these surgeries are within the same surgery group, the Rothschild House Group (RHG).

9.667 Paragraph 6.9 of the Socio-Economic Impact Statement (SEIS) (Document 15) states that engagement with the Rothschild House Group has indicated that there is limited capacity in the existing Tring surgeries. For example, demand (measured by usage of consulting rooms) at existing GP surgeries in Tring currently exceeds ideal levels (80% of total consulting room capacity).

9.668 The new resident population will generate additional demand for health services within the locality. The SEIS explains that the modelled population profile of the development, a demand equivalent of circa 1.8 full-time equivalent general practitioners.

9.669 The application proposes a either a new Health Facility on-site, up to 1000sq.m, or the provision of a contribution towards the improvement of other off-site facilities. The Illustrative Masterplan includes space to include a surgery with up to 20 consulting rooms.

9.670 The Herts Valley Clinical Commissioning Group (HVCCG) have requested a financial contribution of £1,808,671.20 towards primary care. The Applicant has agreed to either provide the serviced site and the financial contribution; or, if the HVCCG decide another site is preferable, then just the financial contribution.

9.671 It is worth nothing that during the course of this application further comments were received from the HVCCG and RHG. The comments highlighted that there are currently strategic discussions regarding a two-site option or a single site option for a new health facility in the area. The comments revealed that whilst the consultees are grateful that the provision of health has been considered, the size of the site might not specifically align with their strategic vision. A comment from the RHG suggested that if the site was marginally larger it may also be able to accommodate for the larger single site option, should it come forward. This was discussed with the Agent but no adjustments were made to the scheme in this regard.

9.672 Paragraph 93 of the Framework requires planning decisions to take into account and support the delivery of local strategies to improve health for all sections of the community through the provision of appropriate facilities.

9.673 At this stage the local strategy has not been fully established with regards to healthcare. However, the proposed development offers either a substantial contribution towards the provision of healthcare in the area, or this contribution combined with up to 0.6ha of serviced land. Whilst the land may not cater for the larger single site option as discussed above, it would likely contribute towards a two-site option.

9.674 Overall it is concluded that the proposed Health Facility and financial contribution would meet the healthcare demands generated by the proposal.

Community Building(s), Shops and Services

9.675 The proposals include the provision of a community building(s) up to 405sq.m. Through the course of this application this was increased by a further 150sq.m for a sports pavilion/clubhouse, which would include additional facilities (changing rooms, bar/social space, kitchen and space for match officials).

9.676 There is also provision for a number of shops/services including retail shops, restaurants, financial and professional services and a day nursery (built floorspace up to 1000sq.m) in addition to a wine bar, pub and takeaway (up to 250sq.m). The Planning Statement explains that the proposed facilities are appropriate for the scale of the development. These are likely to come forward towards the latter stages of development based on the population growth of the development.

Summary

9.677 The proposed development makes provision for a wide range of uses and facilities. As such, it is considered to represent a policy compliant scheme in terms of the mix of built development. The proposals are therefore felt to comply with Policy CS23 and the relevant sections of the Framework in this regard.

Socio-Economic Impacts

9.678 The socio-economic impacts of the scheme are described in the SEIS (Document 15) and Environmental Statement (Document 6). These are summarised in the following paragraphs.

9.679 The submitted information identifies a number of moderate beneficial socio-economic benefits associated with the development proposals. These include:

- The provision of new homes to support population growth and help to address housing supply and demand.
- Provide a variety of housing options to meet a variety of needs, including affordable housing, older persons accommodation and self-build/custom build.
- Support the growth of the economy in the area through the provision of housing for workers.
- Provide social infrastructure for new residents through on-site facilities e.g. new schools and various off-site contributions.
- Enhance the quantum and quality of open space and sporting facilities available to new and existing residents.

9.680 It is considered that the new housing and associated increase in population would be adequately supported by the provision of social and community infrastructure. The proposed mixed-use development would also support the creation of new local jobs, which represents an economic benefit to the town and wider Borough.

Climate Change and Sustainability

9.681 The energy and carbon performance expectations for new developments are rapidly evolving as the UK moves towards a legislated net zero commitment by 2050. Section 14 of the Framework explains that the planning system should support the transition to a low carbon future in a changing climate.

9.682 DBC was one of the first local authorities to declare a climate and ecological emergency and has made a pledge to become net zero by 2030, and with its housing stock to become net zero by 2050 in line with UK targets.

9.683 The EIA Regulations 2017 require an assessment of a development proposal in terms of the effects it would have on climate change. The Environmental Statement includes sections on how the proposal responds to national and local policy relating to sustainability objectives and the response/adaptation to climate change. Impacts of climate change in relation to the development and its vulnerability are also considered.

9.684 The Building Regulations drive minimum energy efficiency and carbon reduction improvements in new buildings.

9.685 In June 2022 the new interim update to Building Regulations: Part L (2021) came into force, requiring higher performance targets – CO2 emissions are reduced by 31% for dwellings and 27% for other buildings – and a new emphasis on low carbon heating systems.

9.686 These are an interim step towards the Future Homes Standard (FHS) and Future Buildings Standard (FBS) that will arrive in 2025. The FHS has been confirmed as requiring around 75% carbon reduction for new homes from Part L to demonstrate compliance.

9.687 The planning system also has an important role in the delivery of sustainable development.

Planning Policy

9.688 The Framework identifies that the purpose of the planning system is to contribute to the achievement of sustainable development. This encompasses economic, social and environmental factors.

9.689 Proposals should be designed in accordance with DBC's 'Be Lean (use less energy), Clean (supply energy efficiently) and Green (use renewable energy)' principles (see Figure 16 (p.121) of the Core Strategy). Policy CS28 requires new developments to minimise carbon emissions and CS29 requires new development to comply with the highest standards of sustainable design and construction, laying out a number of principles to be satisfied.

Assessment

9.690 The approach to sustainability is detailed in the Energy and Sustainability Strategy (Document 17) (ESS). This explains the Applicant's intention to achieve a level of carbon reduction and renewable energy generation beyond the targets of the emerging Plan to align the FHS from the initial stage of the development.

9.691 The ESS confirms that a number of design measures will be implemented to achieve this, including:

- Passive design measures including the orientation of buildings to optimise photovoltaic (PV) solar panels, solar gains through dual-aspect and larger windows and low g-value glazing.

- Ensuring that the fabric of buildings aligns with the FHS. A Fabric Energy Efficiency Standard will also be utilised to ensure a minimum level of building fabric performance across new homes.
- Active design measures that will deliver efficiency benefits through building services specifications, for example, all lighting to be high efficiency LED types, mechanical ventilation with heat recovery (MVHR) systems, heat pump systems and the use of solar panels.

9.692 In terms of site specifics, paragraph 11.4.3 highlights a combination of 'on-plot' Air Source Heat Pumps (ASHP) for each dwelling and PV panels, with an average of 4 to 5 panels per dwelling across the site (see Paragraphs 12.4.2-12.4.3).

9.693 Section 13 of the ESS sets out that the measures set out above demonstrate and achieve reduced regulated carbon emissions of 90% against Part L 2021 compliance.

9.694 There is no inclusion of a neighbourhood energy approach such as district heating networks, site-wide heating networks or energy centres, which could store renewable energy generated on the site. DBC's Strategic Design Code SPD highlights the following in relation to energy generation on large developments: *'8.7.2 For large developments, incorporation of sustainable district heating and power networks (CHP) where this is an appropriate solution, and community energy schemes.'*

9.695 Section 11 of the ESS explains that whilst a high level investigation has been undertaken in this regard, various constraints pose phasing and build out challenges, for example the main road and primary street bus route that would likely be the route of buried infrastructure. Further, *'whilst a heat network solution may offer modest improvements in carbon reductions, this must be balanced against a substantial increase in costs to deliver low temperature heat network infrastructure which would be influenced further by site phasing and heating (and cooling) demand profiles within each phase.'*

9.696 Limited details have been provided to the LPA in terms of the high level assessment into a neighbourhood energy approach. Considering that the proposals represent one of the largest housing sites in the Borough, it is felt that the lack of further investigation is a missed opportunity in the design to tackle the climate crisis and appears to be ruled out in the EES without detailed investigation provided.

9.697 The DAS, paragraph 4.5, also explains how the proposed development would respond to climate change. A number of principles are noted, including the commitment to provide carbon off-setting through the planting of two trees per dwelling. To secure this the Agent has confirmed that a tree planting strategy condition, securing the planting of 2,800 trees over the lifetime of the development, could be added, if approved.

9.698 Based on the above and subject to conditions requiring the above to be adhered to, the proposal would broadly meet and exceed current and emerging Policy requirements in terms of sustainability and carbon emissions. However, there is a lack of detailed design work to underpin the statement that neighbourhood energy solutions would not be feasible on the site. Therefore, whilst the proposals are considered to comply with Policies CS28 and CS29, as well as the Framework, the scheme is not considered 'exemplar scheme' in this respect as described in the ESS.

Heritage, Archaeology and Conservation

9.699 Information relating to archaeology and built heritage are contained within the submission i.e. Environmental Statement (Chapter 7) and appendices C.1-C.2, Archaeological Statement

(Document 18), Archaeological Desk Based Assessment (Document 18i) and Built Heritage Statement (Document 19).

9.700 The documents above provide a historical context and detail the designated and undesignated heritage assets within proximity to the site, in addition to archaeological features.

Planning Policy

9.701 The Planning (Listed Building and Conservation Areas Act 1990, Sections 16 and 66 require LPAs to have special regard to the desirability of preserving historic buildings and their settings. Special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving (i.e. keeping from harm) listed buildings and their setting.

9.702 The specific historic environment policies within the Framework are contained within paragraphs 189-208. Paragraph 197 states that in determining planning applications, LPAs should take account of the desirability of sustaining and enhancing the significance of heritage assets. Paragraph 199 outlines that when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight' should be given to the asset's conservation, including buried archaeology. Paragraph 200 provides that any harm to or loss of significance of a designated heritage asset should require clear and convincing justification. Paragraph 201 states that where proposed development will lead to substantial harm or total loss of significance of a designated heritage asset, LPAs should refuse consent unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm. Where the harm is considered less than substantial, Paragraph 202 states that this should be weighed against the public benefits of the proposal. The Framework therefore does allow for a degree of harm to a heritage asset in particular circumstances but there is a strong presumption in favour of the preservation of designated heritage assets.

9.703 Saved Policy 118 Planning permission will not be granted for development which would adversely affect scheduled ancient monuments or other nationally important sites and monuments, or their settings. Consideration is also given to the Ancient Monuments and Archaeological Areas Act 1979.

9.704 Saved Policy 119 of the Dacorum Local Plan (2004) states that every effort will be made to ensure that any new development liable to affect the character of an adjacent listed building will be of such a scale and appearance, and will make use of such materials, as will retain the character and setting of the listed building.

9.705 Policy CS27 of the Dacorum Core Strategy seeks to ensure that the integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced, with development positively conserving and enhancing the appearance and character of the Conservation Areas.

9.706 Other useful documents include Historic England's 'Good Practice Advice' note, which provides assistance concerning the assessment of the setting of heritage assets.

Historic Context

9.707 Tring has evolved from a primarily agricultural settlement, with farming at the core of its economy, to a thriving market town following the construction of the Grand Union Canal in 1799. In 1823 a substantial Silk Mill was constructed followed closely by the London and Birmingham Railway in 1835.

9.708 The Canal opened in 1805, forming the eastern boundary of the application site. By the early 1830's an avenue of trees had been planted in the south, which are potentially associated with the Pendley Hall estate.

9.709 The historic village of Pendley is recorded from the 4th century AD. By the 15th century, Pendley was a small town. In the 15th century, Sir Robert Whytingham enclosed 200 acres after receiving a free warren from King Henry VI. The buildings were torn down and the land returned to pasture. Pendley Manor survived, however, the medieval manor building burnt down around 1835. In 1872 the local and mill owner commissioned architect Walter F K Ryan to build a new Tudor style manor, the present building.

9.710 The application site forms part of the agricultural land that surrounds Tring. The 1884 OS map shows the site in rural use, with Grove Cottages at the south-west, with a cluster of other farm buildings.

9.711 By 1899 a terrace of properties had been built at the north-west of the site associated with New Mill. The rest of the area primarily remained agricultural. The site and its surrounding remained relatively consistent until the 1980 OS, which shows the large-scale growth to the south-west of Grove Road, demonstrating the growth of Tring in the late twentieth century. The garden centre to the north of the site was constructed in the late 1990s.

Listed Buildings

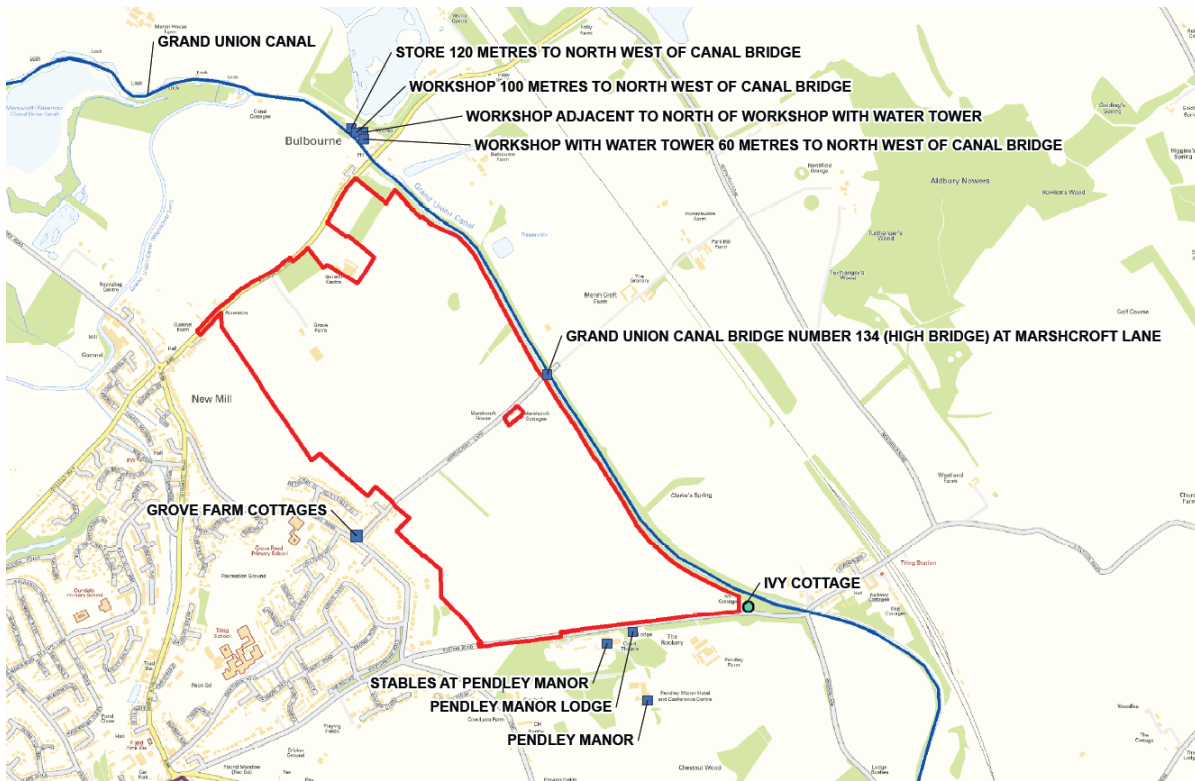
9.712 Although the site does not contain any nationally designated buildings or conservation areas, 29 listed buildings are located within one kilometre of the site. The closest of which include 134 (High Bridge) at Marshcroft Lane (Grade II), Pendley Manor and its associated buildings (Stable and Lodge) (Grade II) and Grove Farm Cottages (Grade II). North of the site and outside of Dacorum's boundary there are other heritage assets for example the British Waterways Repair Yard that is currently being redeveloped (see Aylesbury Vale District Council, application 16/01079/APP).

9.713 Ivy Cottage, located adjacent to the site, has also been identified as being an important non-designated heritage asset that could be impacted by the proposals. Other buildings of interest can be found on Marshcroft Lane that appear to have some Rothschild influenced design.

9.714 The Built Heritage Statement concludes that the proposed development of the Site would have no direct, physical impact on the fabric of any listed buildings or non-designated built heritage assets. Further, the only designated built heritage assets facing any impact, with a section of the Site forming a part of these assets' setting, are the Grade II listed Pendley Manor Lodge and the former Pendley Manor Stables. The only non-designated built heritage assets facing any impact (with a part of the site similarly forming a section of these assets' setting) are the Grand Union Canal and Ivy Cottage.

9.715 The Statement identifies the levels of harm to the significance of the two identified designated built heritage assets within the spectrum of 'less than substantial harm' (at a minor level of harm within that spectrum).

Figure 7 – Heritage Assets



Other Heritage Assets

9.716 In addition to the listed buildings above, the Built Heritage Statement identifies that the significance of certain more distant heritage assets as being potentially legible, including: Bridgewater Monument (Grade II*), Tring Park (Grade II Registered Park and Garden), Tring Park Mansion (Grade II*), the Clown Tower (Grade II*) and the Obelisk (Grade II). Assets at Aldbury Nowers including Grimm's Ditch and two prehistoric burial grounds (Scheduled Monuments) were also identified.

9.717 The Statement discounts these 'other heritage assets' due to distance, lack of inter-visibility and lack of legibility.

Assessment

9.718 The Built Heritage Statement and Environmental Statement explain that there would be no direct physical impacts on designated or non-designated heritage assets. The only designated built heritage receptors facing any effect, with a section of the site forming part of these assets' setting, are Pendley Manor Lodge and the former Pendley Manor Stables. The only non-designated receptor facing any effect are the Grand Union Canal and Ivy Cottage.

9.719 The greatest significance of effect to the identified receptors occurs during the operational phase of the development, with 'minor significance' and 'negligible significance' identified for the built heritage and non-built heritage receptors, respectively.

9.720 The reports indicate that as the detailed design would be agreed at reserved matters stage, the detail of buildings, layout and appearance would be determined at a later date. This would allow for heritage considerations to inform the future design stages, thereby allowing mitigation to commence following outline consent.

9.721 Aside from the embedded mitigation that could be sought through design, it is noted that some heritage gain would be achieved through other elements of the scheme. For example, the

proposed upgrades to the canal tow path and other public footpaths would make these routes more accessible and attractive, therefore allowing residents to appreciate certain elements of Tring's historic environment.

9.722 The Environmental Statement (paragraphs 7.7.7 and 7.8.6) also explain that heritage interpretation through design i.e. use of street furniture, street art, street names and other means such as interpretation boards, could be used to enhance public understanding and appreciation. Whilst this is discussed in the archaeology section, this could extend to other elements of heritage associated with Tring. These would be captured at the later reserved matters stage of the planning application.

9.723 DBC's Conservation and Design Team has reviewed the information submitted (their full comments can be found in Appendix A). Regarding the above-mentioned heritage assets, they have stated that "in all of these cases, the scheme should be assessed as causing less than substantial harm."

9.724 Paragraph 196 of the Framework states that:

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'

9.725 In this instance it is considered that, when weighing up the public benefits that would accrue from the proposed development, primarily the 630 affordable homes and the provision of an extra care facility, the public benefits would outweigh the identified less than substantial harm/low level harm to the setting of the heritage assets giving that harm the considerable importance and weight required by section 66 of the Planning (Listed Building and Conservation Areas) Act 1990.

9.726 The proposals are considered to be in accordance with Framework paragraphs 189-208 as well as Core Strategy Policy CS27 and saved Policies 119 and 120.

Archaeology

9.727 There are no designated heritage assets on the site and therefore none would be directly physically impacted by the proposals. Aerial photographs recorded a possible Iron Age or Roman double-ditch enclosure in the south-western part of the site. This lies within the defined Area of Archaeological Significance. An initial assessment of the cropmark evidence suggested that the feature is of less than national importance and can be considered of more local to regional interest.

9.728 The Archaeological Assessment states that based on the current evidence, a low to moderate archaeological potential has been identified for late prehistoric/Roman roadside activity in the north of the site associated with Icknield Way and a moderate potential for remains associated with the above-mentioned double-ditch enclosure.

9.729 Across the rest of the site, the Assessment states that low archaeological potential is identified for all other past periods of human activity, although evidence of medieval and later agricultural/horticultural activity is anticipated.

9.730 The Assessment concludes that the proposal has the potential to impact archaeological remains of a local to at most regional importance.

9.731 The Historic Environment Team at HCC have responded to this application, highlighting that the Applicant's archaeological advisors have consulted extensively with them. In-line with HCC's advice, a geophysical survey was carried out followed by some trial trenching. This provided a

preliminary assessment of archaeology on the site, which has a primary objective of establishing the likelihood of finding remains of national significance.

9.732 HCC have reviewed the Archaeological Assessments submitted and confirm that the information provided is sufficient to allow for the application to be determined, subject to a further phase of trial trenching evaluation in order to determine the extent of archaeological remains, followed by any relevant mitigation. The Historic Environment Team therefore recommended a number of conditions relating to further evaluation, mitigation measures and analysis of results and further protection measures. These would be added if the application is successful.

9.733 It is worth noting the mitigation measures listed regarding impacts on archaeology, as set out in section 7.6.2 of the Environmental Statement. These include such things as removing areas from cultivation and to preserve it as areas of open space and providing heritage interpretations, which may have some long term beneficial effects.

9.734 In summary, the work done to-date and ability for further work through later stages of the planning application process has satisfied the Historic Environment Team. On balance, the scheme is considered policy-compliant in terms of archaeology and therefore archaeology does not pose a constraint to these proposals.

Connectivity, Highway Implications and Parking Provision

9.735 The proposals involve two new primary access points, detailed in Document 4b 'Access Details for Approval'. The Movement and Access plan (Document 4a, Part 4, Revision A), Transport Assessment (Document 11), Framework Travel Plan (Document 12) and subsequent Transport Assessment Addendum (Revision AA) cover other matters associated with connectivity, highways matters and parking provision.

Planning Policy

9.736 Policies CS8, CS9 and saved Policy 51 seek to ensure developments have no detrimental impacts in terms of highway safety. Paragraph 111 of the Framework states, '*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*'

9.737 Paragraphs 110 and 112 require development, amongst other things, to promote opportunities to, and prioritise, sustainable travel modes, as well as providing safe, secure and attractive plans to minimise scope for conflicts between pedestrians, cycles and vehicles.

9.738 Policy CS12 seeks to ensure developments have sufficient parking provision. The Framework states that if setting local parking standards authorities should take into account the accessibility of the development, the type, mix and use of the development, availability of public transport; local car ownership levels and the overall need to reduce the use of high emission vehicles.

9.739 DBC's Parking Standards (2020) SPD provides policy guidance for the amount of parking provision required for new developments.

Existing Conditions

9.740 The application site is located on the edge of an established urban area. As such, the neighbouring settlement has been developed to provide good transport links for existing residents. There are local shops and public transportation linkages (buses and the main line railway). The existing conditions are detailed in Section 3 of the Framework Travel Plan (FTP). The images below (taken from the FTP) illustrate existing walking/cycling routes and bus services in the area.

Figure 8 – Existing Local Pedestrian and Cycle Infrastructure



Figure 9 – Existing Bus Infrastructure



Highway and Connectivity Proposals

9.741 The application proposes two points of vehicular access – the northern vehicular access would be from Bulbourne Road and the southern from Station Road. These access points would be connected through an internal spine road, described as the ‘Main Street’.

9.742 On Station Road it is proposed to provide a new signalised T-junction. It has been designed to accommodate larger vehicles such as rigid HGV, buses and refuse vehicles. The application proposed a reduction in the speed limit from 60mph to 40mph at the Station Road frontage. The Highway Authority have reviewed the proposed speed limit reduction in consultation with HCC’s Speed Management Group and highlighted that the speed limit should not be reduced below 50mph. As such, the Highway Authority noted that some adjustments would be required to the

submitted design if the application is approved and confirmed that this could be secured by planning condition.

9.743 The existing shared pedestrian and cycleway along the northern side of Station Road would be retained and a new segregated cycleway/footway would be provided within the site, north of the existing treeline. Links to Station Road from the new foot/cycleway would be provided in western and eastern corners of the site.

9.744 Within the site, the new pedestrian and cycle facilities would be provided. The primary route would consist of a two-way segregated cycle lane with a small verge separating the footway.

9.745 The northern access at Bulbourne Road would include a ghost island and right turn priority controlled T-junction. Both accesses have been designed in accordance with the Design Manual for Roads and Bridges (DRMB).

9.746 Marshcroft Lane, which runs through the centre of the site, would be bisected by the Main Road. At this point, it is proposed to re-designate the western part for pedestrian and cycle use only. This would be controlled with the use of bollards at either end of the affected part of the lane. There are a number of existing dwellings being retained on Marshcroft Lane. These properties would retain access through the Main Road. The eastern section would remain accessible for non-motorised users, as is currently the case. The image below shows the approximate locations for the proposed bollards and alternative route for existing residents.

Figure 10 – Marshcroft Lane Proposals



Off-Site Highways Improvements

9.747 As part of the evidence base for the emerging Local Plan DBC commissioned AECOM to undertake the Tring and Berkhamsted Sustainable Transport Study (STS) to identify improvements to the local transport network to facility growth in these areas. The Transport Assessment (TA) explains that as part of the proposals, the Applicant is proposing a number of financial contributions towards partial or full delivery of the suggested schemes in the area. These include:

- Toucan Crossing – London Road (Ti26)
- New Cycle Route along A4251 (Ti35)

- Minor Junction Improvements to Station Road / Bridge Way (Ti36)
- New Speed Table Station Road and Crossing (Ti56)
- Informal Crossing at junction of Grove Road / Marshcroft Lane (Ti31)
- New Uncontrolled crossing and footway widening of Grove Road (Ti68)

Highway Impacts and Proposed Mitigation

9.748 The Transport Assessment (TA) establishes baseline traffic flows on the local highway network. A number of traffic surveys were undertaken and as agreed with HCC, Covid-19 uplift factors were applied to the surveyed traffic flows. Personal injury accident data was also obtained from HCC for a five-year period. No significant trends or patterns of accidents were found that would be exacerbated by the proposals.

9.749 The proposed site access junctions were subject to a Stage 1 Road Safety Audit and a designer’s response prepared for each comment. Designs were then updated to reflect the auditors comments, where considered appropriate.

9.750 The TA highlights that a ‘servicing strategy’ would be put in place in future reserved matters applications to aid the assessments above. This would ensure that delivery vehicles for the non-residential uses would arrive/depart at preferable times in the day and use specific routes to protect residential amenity.

9.751 An extensive trip generation exercise was undertaken. Regarding multimodal trips, the TA demonstrates that the residential element of the proposal would generate significant demand across the travel modes during peak hours (see Table 8). However, considering the proximity to the railway station and improvements to pedestrian and cycle routes, it is suggested that a sizable number of trips would be made by rail.

Table 8 – Multimodal Trip Generation

Travel Mode	Travel Plan Mode Share Target	AM Peak Hour Trip Generation	PM Peak Hour Trip Generation
Train, Underground	18%	180	189
Bus, Minibus or Coach	3%	30	32
Taxi	0%	0	0
Motorcycle, Scooter or Moped	1%	10	11
Car or Van (Driving)	61%	611	644
Car or Van (Passenger)	4%	40	42
Bicycle	3%	30	32
On Foot	10%	100	105
Total		1,001	1,054

9.752 Regarding vehicular trip generation using the parameters for the land uses proposed, the TA sets out the total external vehicular trip generation as per below.

Table 9 – Total External Development Vehicle Trip Generation

Time Period	AM Peak Hour (0800-0900)			PM Peak Hour (1700-1800)		
	Arrive	Depart	Two Way	Arrive	Depart	Two Way
Residential	175	504	679	501	214	715
Primary School	35	21	55	3	4	7
Secondary School	181	135	316	25	26	51
Local Centre	13	12	25	13	13	27
Health Centre	26	12	38	13	15	29
Total	429	684	1,113	555	273	828

9.753 The TA explains that Census data reveals that the highest proportions of external trips are expected to be heading to Aylesbury (18.6%) and Hemel Hempstead (14.8%), likely as a result of the wide range of employment opportunities at these locations. A further 11.2% are expected to travel to Berkhamsted with 7.6% staying within Tring itself.

9.754 The TA then breaks down likely traffic distribution, explaining that the majority heading onto Station Road (West) followed by Cow Lane and the A41 (East). The full traffic distribution data is found in Table 8.11 of the TA.

9.755 Following the above assessment, a number of junctions have been assessed in terms of capacity and traffic generation from the development proposals. The junction assessment explains that whilst a number of junctions would still be able to operate within capacity, three would be likely to experience issues in terms of queuing and delays and therefore mitigation packages are proposed. These are listed below.

- A4251 / Cow Lane

The mitigation scheme would upgrade the junction to a signalised junction. The results of the modelling for this mitigation scheme illustrate the junction is forecast to operate within capacity for both of the scenarios tested, providing an improvement on the existing junction arrangement.

- Station Road / Cow Lane / Grove Road

The mitigation scheme is to upgrade the junction to a mini roundabout to ease traffic flow which is currently operating as a staggered crossroads. The results demonstrate that, with the mitigation scheme, the junction is forecast to operate within capacity with limited queuing and delay.

- High Street / Brook Street / London Road.

The proposed mitigation scheme is to upgrade the junction a double mini roundabout. This mitigation package creates a degree of additional queuing and delay on London Road, but is forecast to have a material benefit in other locations. In particular, Station Road is forecast to have material reductions in queuing and delay in the AM Peak Hour, as is Brook Street.

9.756 HCC Highways were consulted on the TA. They requested that Stantec's (the Applicant's highway consultant) TRICS and Census based methodology be run against HCC's COMET Strategic model. Information relating to this was provided within the supplementary Transport Assessment Addendum (Revision AA, June 2022). The Addendum explains that a review of both

methods/models provides a robust analysis of the forecast development impact on the highway network.

9.757 HCC Officers explained that *'with respect to the localised junction modelling on the wider highway network, supported also by the COMET model run, the Highway Authority is content with the analysis presented.'* The TA Addendum explained that Stantec were content that the proposed junction enhancements represent the best option in terms of mitigation.

9.758 A few further points were raised by HCC and two technical notes were submitted, TN14 (dated 14th August 2022) followed by TN15 (dated 16th September 2022). Upon review of this information, HCC noted that the technical assessment methodology and proposed access strategy is acceptable. However, detailed design and road safety audit conditions would be required to ensure that the junctions can be satisfactorily implemented.

9.759 It should be noted that a New Mill 'Sensitivity Test' was undertaken as part of the highways assessments, which demonstrates that the proposed development would not prejudice the development coming forward on this neighbouring site and that the proposed access junctions could accommodate additional development traffic from New Mill. This indicates that the proposals would not hinder the neighbouring site in terms of highway impacts should it come forward in the future.

Pedestrian and Cycle Access

9.760 As indicated on the Movement and Access Parameter Plan (Document 4a, Part 4, Revision A), the proposals include a number of routes for cyclists and pedestrians. A segregated foot/cycleway is proposed adjacent to the Main Street. Secondary routes from this into different areas of the development. These connections would connect to the footway/cycleway that runs adjacent to Station Road, providing a link to the train station and Tring High Street. Pedestrian and cycle access would also be provided to Grove Road via Marshcroft Lane.

9.761 Pedestrian facilities would also be delivered to the north of the site through a footway along the southern side of Bulbourne Road, which would tie in with the existing pavement in front of the properties.

9.762 The proposed SANG would benefit from a number of walking and cycling routes to be used for connectivity but also leisure purposes.

9.763 Paragraph 5.6.3 of the FTP explains that the Design Code has been created with consideration to HCC's emerging design standards and guidance, the Government's Local Transport Note LTN 1/20 and the latest revisions to the Highway Code, which afford more priority to non-motorised users.

Off-Site Pedestrian and Cycle Improvements

9.764 The proposals also offer the following pedestrian and cycle improvements:

- Town Centre Cycle Parking
- Improved Signage for Grand Union Canal and Tring Reservoirs Cycle Paths
- Cycle Parking at Startup's End Car Park

9.765 In addition to the improvements above, a range of financial contributions have been offered in relation to cycle/footway improvements. These are discussed in more detail later.

Bus and Rail Infrastructure

9.766 The application proposes a new bus service that would provide direct connections between Tring town centre, the application site and the train station. It would have a 20-minute frequency and run between 05:00-22:00. A subsidy would be provided for the service in addition to bus vouchers for new residents.

9.767 The proposals also include financial contributions towards improving Tring Railway Station, including station forecourt improvements, toilet pod, retail pod and seating area, additional CCTV, additional lighting, ticket vending machine, rail point help point and the relocation of the taxi rank, taxi office, staff spaces and cycle store.

9.768 A new crossing and footway is proposed to access the station building along with a new bus and taxi shelter area. A reconfiguration of the forecourt area would enable buses to enter the forecourt. Additional cycle parking would also be provided.

Contributions

9.769 The application proposes the following contributions in relation to highways, public transport, sustainable travel and connectivity:

- Junction Improvements £985,000

Covers the aforementioned junction improvements and speed limit reduction.

- Public Transport Improvements £714,000

Includes a subsidy for the new bus service and train station improvements.

- Pedestrian and Cycle Improvements £461,073

Provides cycle parking in the town, improved signage off-site, new cycle routes and footway/cycle improvements, junction enhancements and new crossings.

- Travel Plan Measures £671,300

Money to fund a travel plan coordinator, bus vouchers for future residents, TRICS compliant surveys, travel plans and evaluation fees and travel information welcome packs.

9.770 In addition to the above, further financial contributions have been agreed following discussions with consultees, including:

9.771 Following comments from the Canals and Rivers Trust, the Applicant agreed to fund improvement of 1258 metres of canal towpath between Bulbourne Road and Station Road.

9.772 In response to the Rights of Way Officer at DBC, the Applicant agreed to fund improvements to the footpath link between Marshcroft Lane and Northfield Road (TT62).

9.773 The total cost of the above improvements is estimated at circa £475,000, which would be captured through the S106 Agreement if the application is approved.

Total £3,306,373.

Assessment

9.774 The existing and proposed highway conditions have been thoroughly modelled and assessed both by the Applicant's transport consultants and the Highway Authority. A range of mitigation measures are proposed, including enhancements to three junctions that are forecast to exceed capacity flows. The mitigation schemes highlight that the development traffic could be accommodated without severe impacts on those junctions or delays on the highway.

9.775 Two new vehicular accesses would be provided – a new signalised junction on Station Road and a priority-controlled ghost island junction on Bubourne Road. These junctions would be connected via a 20mph spine road with a number of points of access for pedestrians and cyclists, including at Marshcroft Lane to provide an attractive route from the site to the town centre.

9.776 Overall the assessments have demonstrated that the proposed transport strategy would not have a severe impact on the local highway network. As such, no unacceptable impacts are identified in-line with Paragraph 111 of the Framework.

9.777 New pedestrian and cycle facilities across the site, together with a range of proposed improvements to existing facilities, would provide a framework of safe and convenient routes across the development and into the wider area. The proposals would satisfactorily link to key destinations and would not appear to impact New Mill proposals in the future, should they come forward. A mechanism has been added to the proposed legal agreement to ensure that cycle/foot connections could be made to the New Mill site at the Applicant's expense should the development come forward.

9.778 The introduction of a new cycleway/footway along the southern boundary of the site would provide a safe, lit route that is considered as a significant beneficial connection between the existing town centre and the railway station. Furthermore, the proposed bus service would provide genuine opportunities for existing and future residents to travel sustainably to the station. The proposed improvements/contributions towards the enhancement of the station would also provide a betterment for all users.

9.779 The proposed pedestrian and cycle infrastructure together with the Travel Plan and other proposed enhancements would encourage sustainable travel behaviours and provide genuine opportunities to shift from private car to sustainable modes of travel.

9.780 Taking all of the above into account, it is considered that the connectivity and highways elements of the proposals are in compliance with the aforementioned policies.

Parking Provision

9.781 Policy CS12 seeks to ensure developments have sufficient parking provision. The Framework states that if setting local parking standards authorities should take into account the accessibility of the development, the type, mix and use of the development, availability of public transport; local car ownership levels and the overall need to reduce the use of high emission vehicles.

9.782 DBC's Parking Standards (2020) SPD provides policy guidance for the amount of parking provision required for new developments. The site is situated within Accessibility Zone 3. For Use Class C3 (residential), it highlights the following requirements:

If 50% or more of the spaces are allocated:

1-bedroom units = 1.25 spaces

2-bedroom units = 1.5 spaces

3-bedroom units = 2.25 spaces

4-bedroom units = 3 spaces

5+ bedroom units = assessed on an individual case basis

If 50% or more are unallocated:

1-bedroom units = 1 spaces

2-bedroom units = 1.2 spaces

3-bedroom units = 1.8 spaces

4-bedroom units = 2.4

5+ bedroom units = assessed on an individual case basis

Disabled parking: 5% of spaces. Disabled persons parking bays must be for residents' use only and not be allocated to specific dwellings, unless provided within the curtilage of the dwelling.

Electric vehicle charging: 50% of all spaces to be active provision, another remaining 50% to be passive provision; if electric spaces allocated, the Council will require a higher proportion of provision agreed on a case by case basis.

Cycle parking standards: 1 per 20 units for >50 units plus 1 long term space per unit if no garage or shed is provided.

Visitor parking (schemes of 10 units or more):

50-100% of spaces allocated = car parking standard plus 20%

All unallocated = no visitor parking required

Less than 50% of spaces allocated = subject to Council decision

9.783 Aside from residential the development would provide a number of other uses (e.g. education, retail, etc.). The breakdown of parking requirements for the individual uses is highlighted in the SPD.

9.784 Paragraph 5.7.3 of the FTP explains that full details of car and cycle parking would be provided as part of the reserved matters applications, however, for the purposes of the masterplan concept layout, the SPD standards have been utilised.

9.785 Paragraph 5.7.6 states that every residential parking space would be provided with electric charging infrastructure. This would be further secured through the reserved matters applications and subsequent conditions, if this application is approved. This would also capture electric charging points for the other uses on the site and public parking areas.

9.786 The outline proposals provide sufficient space to meet DBC's parking standards and provision has been made for electric vehicle infrastructure. Therefore, no objection is raised to the proposed parking provision.

Other Material Planning Considerations

Utilities

9.787 The application is supported by a Utilities Statement (Document 9ii, Appendix 2). This explains that the proposals have been informed by a consideration of on-site utilities infrastructure. Evidence of discussions with various utility providers is found within the Statement, revealing the Applicant has discussed the scheme with to establish infrastructure connections and capacity requirements with the providers. No concerns are raised in relation to utility infrastructure at this outline stage.

Oil Pipeline

9.788 As previously mentioned in the drainage and flood risk section, BPA have responded to the application and have not suggested that the existing oil pipeline would present a constraint to development. However, as suggested, further correspondence would be required between parties if the application is approved to establish a detailed design for any proposed infrastructure that crosses or is located near to the pipeline easement.

Article 4 Direction

9.789 An Article 4 Direction referred to 'Land at Marshcroft Farm, Bulbourne Road, Tring' was placed on the northern parcel in 1990. This prohibited development within Class A, Part 6, Schedule 2 of the General Permitted Development Order, which relates to works for the erection, extension or alteration of an agricultural or forestry building, or any excavation or excavation or engineering operations that are reasonably necessary for the purposes of agriculture within that unit.

9.790 The proposed uses do not include agricultural or forestry. Therefore, it is not felt that this Article 4 Direction would prohibit the proposals in any way.

Land Stability

9.791 Land stability is a material planning consideration and referred to in paragraphs 174, 183 and 184 of the Framework.

9.792 It is important that the proposed development does not adversely affect the stability of the cutting slope to the Grand Union canal, as this could increase the risk of damage to the adjacent canal.

9.793 The CRT have discussed this with the Applicant's engineers and they have confirmed that the infiltration basins in the SANG are sufficiently far away from the cutting to avoid impacts. Whilst further evidence was not provided on this matter, it is noted that a suitable condition could be imposed, requiring a slope stability assessment of the Grand Union canal and any necessary mitigation measures.

Waste Management

9.794 The Minerals and Waste Planning Authority at HCC has commented on the proposals. They welcomed the inclusion of a Site Waste Management Plan (SWMP) as part of the submission and noted that *'the pre-construction SWMP submitted is considered adequate and sets out sufficient details the Waste Planning Authority would expect to see.'*

9.795 DBC's Waste and Refuse Team have also commented and provided waste requirements for residential and commercial buildings. These details should be followed at reserved matters stage.

East of England Ambulance Service

9.796 During the course of this application a consultation response was received from the East of England Ambulance Service (EEAST) requesting a contribution of circa £340,200 towards health services, particularly towards additional ambulance services and/or new medical equipment (both within and external to the ambulance).

9.797 To establish whether the contribution request would meet the relevant tests under Regulation 122 of the Community Infrastructure Levy Regulations 2010, an email was sent to EEAST requesting further information in relation to the necessity of the requested contribution.

9.798 No response was received from EEAST and without further justification, it is not felt necessary to request the contribution.

Public Consultation Responses

9.799 The public consultation exercises have resulted in circa 320 comments, the majority of which are objecting to the proposed development. It is also noted that a comment has been received from Grove Fields Residents Association (GFRA), which represents 572 residents from the local area. There are key themes arising from the comments, many of which have been discussed in detail throughout this report. The main themes are as follows:

- Loss of/damage to Green Belt land
- Impact on landscape and Chilterns AONB
- Damage to the historic market town character of Tring
- Inappropriate scale of development for Tring / overdevelopment
- Impacts on Chilterns Beechwoods SAC
- Concerns over local infrastructure capacity including roads and public services
- Loss of agricultural land and impacts on food production
- Lack of/insufficient very special circumstances provided
- Environmental and ecological impacts and climate change

9.800 Aside from the themes above, the following comments are noted and responded to below.

- Degradation of canal-side environment

9.801 Saved Policy 106 of the DBLP states that development adjoining the Grand Union Canal will be expected to make a positive contribution to the canal-side environment. The neighbour comments in relation to the canal highlight that the proposed development would impact the quiet, secluded nature of the canal. Whilst the proposals would certainly increase users of the canal, the proposed contributions towards upgrading the towpath, connecting rights of way and provision of signage are considered to outweigh this harm.

- Impacts of lengthy construction process on residential amenity

9.802 It is accepted that if approved, the proposals would impact residential amenity, particularly for residents within close proximity to the site. There are no specific local or national policies that would restrict development proposals due to impacts caused by the construction process. However, there are policies and guidance that relate to construction standards that would be relevant to the application.

- Plans for an apprenticeship scheme within the proposals

9.803 The Health Impact Assessment explains that the construction of the development would directly support a variety of roles, including apprentices. It is noted that this would be temporary employment (for the construction phases).

- Lack of commitments from public bodies e.g. NHS and HCC to ensure the provision of the proposed facilities

9.804 This will be discussed in more detail in the planning balance / very special circumstances section below.

Human Rights and Equality

9.805 In line with Public Sector Equality Duty, the LPA has regard to the need to eliminate discrimination and advance equality of opportunity, as per section 149 of the Equality Act 2010. In determining this application, regard has been given to this Duty and the relevant protected characteristics.

9.806 Considering the type of development proposed and assessment above, it is not considered that discrimination or inequity would arise from the proposal.

S106 and Planning Obligations

9.807 The requirement for new development to provide contributions towards the provision of on-site, local and strategic infrastructure required to support the development is set by Core Strategy Policy CS35 – Infrastructure and Developer Contributions. The policy confirms that contributions will be required to support development unless existing capacity in relevant infrastructure exists and financial contributions will be used in accordance with needs set out in the Council’s Infrastructure Delivery Plan.

9.808 A summary of contributions for the S106 Agreement is set out below. These have all been agreed by the Applicant. Relevant clauses and triggers would be subject to further negotiations to refine and agree them if the application is approved.

Table 10 – Summary of Contributions

Matter	Contribution	Comments and Triggers
Affordable housing	45% - including First Homes, affordable rent and intermediate tenures.	Financial contribution cost represents total additional cost to Developer of providing this level of affordable housing over and above the 35% policy requirement. Trigger set at percentage of occupied residential units (% to be determined).
Social housing	10% (part of Affordable Housing)	Financial contribution cost represents total additional cost to Developer or providing this level of social housing over and above policy requirement. Trigger as above.
Primary school	Early delivery of 2FE school delivered on site, with extra capacity for further growth of the town including space for expansion to 3FE. £10,800,000 2.9 Ha of land	HCC are unable to commit to delivery to set timescale. Developer to construct on or before first occupation of 465 th residential unit.
Secondary school	Serviced site for 6 FE school at no cost to Local Education	Land to be reserved for up to 10 years. Level of financial contribution

	<p>Authority, with room for expansion to 8 FE; with sports facilities for shared community use; and early contribution proportionate to 1,400 units</p> <p>£10,300,000 9.56 Ha of land</p>	<p>and payment triggers set by HCC.</p> <p>Percentage payments would be paid at occupation i.e. 1st dwelling – 5%, 450th dwelling – 30%, 750th dwelling – 35% and final instalment at 1,200th dwelling. If the school is not constructed within three years of the final instalment the land is returned to the Owners.</p>
MUGA & 3G sports pitch and associated facilities	<p>Land for and full delivery of MUGA and 3G Sport pitch at early phasing so that available for wider community use.</p> <p>Note – land is included in part of secondary school land.</p> <p>Floodlit MUGA £300,000 Floodlit 3G Pitch £1,500,000 Total £1,800,000 (estimate)</p>	<p>See Document 21a ‘Technical Note to Sport and Physical Facility Strategy.</p> <p>To include a Sports Hub building Minimum footprint of 1,600sq.m gross internal floor area and parking.</p> <p>Options for operation and long term management of MUGA and sports facilities subject to further discussion.</p> <p>Trigger set at percentage of occupied residential units (% to be determined).</p>
Grass pitches and cricket ground	<p>Land for and full delivery of grass sports pitches for community use – pitch provision in excess of requirement to meet the needs of 1400 new dwellings.</p> <p>4.52 Ha of land Community Building £1,600,000 Grass pitches £1,200,000 Total £2,800,000 (estimate)</p>	<p>With associated community building / cricket pavilion with a minimum footprint of 553sq.m gross internal floor area.</p> <p>Trigger set at percentage of occupied residential units (% to be determined).</p>
Sports facilities off-site	<p>Contributions to:</p> <p>Rugby (league & union) (Tring Rugby Football Club) = £52,089 (pitches) + £134,209 (changing rooms) = £186,298</p> <p>Hockey (Tring Sports Centre) = £50,286 (Pitches) + £20,902 (changing rooms) = £71,188</p> <p>Swimming (improvements at Tring Sports Centre) = £744,117</p> <p>Total £1,001,603</p>	<p>Agreed contribution levels set by Sport England calculator.</p> <p>Trigger set at percentage of occupied residential units (% to be determined).</p>

Health facilities	<p>Serviced land for new branch surgery, plus full S106 contribution.</p> <p>0.29 Ha of land £1,800,000 direct contribution</p>	<p>Herts Valley CCG calculator used to identify direct £1.8m contribution.</p> <p>Trigger set at percentage of occupied residential units (% to be determined).</p>
Community hall	<p>Delivery of a community hall</p> <p>Land and cost of construction</p>	<p>A building of up to 533sq.m.</p> <p>Trigger not yet determined.</p>
Pre-school nursery building	<p>Early delivery of a pre-school nursery building within the local centre</p> <p>Land and cost of construction</p>	<p>A building to be constructed as part of the village centre and made available for use by a preschool nursery operator.</p> <p>Trigger not yet determined.</p>
Open space and play areas	<p>Provision of land and maintenance contributions</p> <p>Land, cost of laying out play areas and maintenance.</p>	<p>Management Company to be established and retained in perpetuity unless otherwise agreed by the council.</p> <p>Trigger not yet determined.</p>
Access to countryside	<p>Improvements to Canal towpath and PRoW</p> <p>£476,270</p>	<p>Works to be carried out by CRT in accordance with their specification at £315/m for 1258m length and £80,000 for improvement to PRoW by Developer.</p> <p>Triggers not yet determined.</p>
SANG provision	<p>27ha laid out within the first phase being made available for wider community use</p> <p>£1,270,000 cost of implementing management plan.</p> <p>Additional area of 10.4ha made available for other housing developments</p>	<p>Management Company to be established.</p> <p>Specification and implementation details agreed pre-commencement. 27ha delivered in first phase prior to occupation of any residential units.</p> <p>Trigger for further 10.4ha not set and dependant on other housing schemes.</p>
SAMM package	<p>Provision of Strategic Access Management and Monitoring (SAMM) for the Beechwoods SAC.</p> <p>£ figure not yet established – waiting for DBC's mitigation</p>	<p>It is confirmed that the Owner will make a financial contribution to the SAMM when there is a mechanism to allow payments to be made.</p>

	strategy	
Orchards and allotments	Land and laying out of orchards and allotments 1.22ha of land Cost of laying orchards and allotments; and cost of implementing management plan	Triggers not yet determined.
Bus service improvements	Provision of high frequency bus Service £464,000	See Transport Assessment Document 11 Part 5 Appendix N Bus Strategy Technical note. Subject to discussion with bus operators. Based on a 10-year service provision. Trigger set at percentage of occupied residential units (% to be determined).
Off-site footpaths and cycle improvements	Various improvements via s.278 and contribution. Includes town centre cycle parking, new cycle routes, signage and crossing improvements including puffin crossing of Station Road at Tring Station. Overall package cost £462,100	Subject to detailed costing as part of s.278 agreement and Road Safety Audits. Triggers set at percentage of occupied residential units (% to be determined).
Off-site highway improvements	Capacity Improvements to three junctions and speed limit reduction on Station Road £985,000	See Transport Assessment Document 11 Part 5 Appendix M and Technical Note 15. Triggers set at percentage of occupied residential units (% to be determined).
Station improvements	Enhanced facilities and improved sustainable connection to town centre with early phasing so that available for wider community use £606,400	Agreement not currently reached regarding costings, design fees, etc. – Developer continues discussion. Anticipated to be delivered after delivery of first residential phase (155 units). Precise trigger not yet determined.
Travel Plan	Including funding of travel plan coordinator for 13 years	See Transport Assessment Document 11 Part 5 Appendix M and Technical

	£671,300	Note 15. Triggers set at percentage of occupied residential units (% to be determined).
Renewable energy	'Fabric first', local air source heat pumps and on-site renewable energy production, to deliver a 90% carbon reduction and carbon zero ready by 2030. Additional cost per unit	Trigger based on completions – possibly conditioned to require a compliance report to be submitted to the LPA.
CIL	£14,500,000	Developer highlights CIL relief of £14.500,000, leaving a remaining £14,500,000 (discussed below).

Community Infrastructure Levy

9.809 The proposed development would be subject to Community Infrastructure Levy (CIL) charges in accordance with Policy CS33 of the Core Strategy and the 'Charging Schedule'. The current CIL requirements, as set out in the Annual CIL Rate Summary 2022, for residential within Zone 2 is £196.06 per sq.m. This rate is live as of January 2022. A small area of the site in the south-east is situated within Zone 1. However, considering that none of the housing is proposed here, it would be unreasonable to apply these rates.

9.810 CIL charge calculations are not usually determined until reserved matters stages. However, discussions with the CIL Team during the course of the application revealed some indicative figures based on the figures stated on CIL Form 1 submitted by the Applicant and the indexation for 2022. These are as follows:

Existing in-use floorspace (subject to evidence and floor plans) – 4,120sq.m
Proposed residential floorspace – 148,122sq.m
Proposed retirement housing – 16,870sq.m – liable but not chargeable

Liable floorspace – 164.580sq.m

Total CIL liability - £29,041,242

9.811 The CIL form indicates 75,915sq.m of social housing that could benefit from relief, subject to criteria and the submission of appropriate CIL Forms. The relief would be approximately £14,520,621 (half), leaving £14,520,621.

Any Other Harm

9.812 As discussed in the Green Belt Harm section, case law has recognised that, following confirmation that the proposed development is 'inappropriate development', then whether there is 'any other harm' to Green Belt must be established.

9.813 Reference to 'any other harm' should also be taken to mean non Green Belt harm (e.g. highways, biodiversity, etc.). The 'other harm' associated with the proposals has been assessed in the relevant sections of this report. However, to summarise, the following has been identified:

- Landscape and Visual Impacts

9.814 A number of significant landscape and visual effects have been identified. The LVIA identifies significant adverse impacts during construction phase with effects reducing overtime, following years of operation. HDA concluded that *'fundamentally the proposals would adversely affect the experiential qualities and visual experience of the Chilterns AONB.'* No noteworthy changes were made to the application following the concerns raised by HDA in relation to reducing these impacts.

9.815 Whilst it is noted that the residual effects would generally reduce once mitigation planting has established, nonetheless adverse visual effects would remain for users of public footpaths including important routes such as the Ridgeway National Trail and views from Aldbury Nowers and the Chilterns escarpment, in addition to properties on the existing settlement edge. This results in further harm which is afforded substantial negative weight.

- Chilterns Beechwoods SAC

9.816 A number of potential effects on the Chilterns Beechwoods SAC have been acknowledged. Although mitigation measures are proposed, the details of the draft mitigation strategy have not been agreed and therefore an agreement cannot be made regarding SAMM. Furthermore, concerns have been raised by Natural England and HCC Ecology regarding the lack of suitable management arrangements in perpetuity, which are considered to be required at this stage. Substantial negative weight is therefore attributed to the harm on the CBSAC.

- Ecology

9.817 It has been demonstrated the proposal would have an acceptable impact on protected species and the outcomes of the BNG report have been broadly established. Whilst there would be some initial loss of habitat across the site, the proposal would provide further habitat creation and an overall uplift in biodiversity. The ecological harm is therefore considered neutral in the planning balance.

- Heritage

9.818 The harm arising from the impact on the setting of heritage assets is considered as 'less than substantial harm'. As there would be some public benefit arising from the development, this would outweigh the less than substantial harm identified. The heritage issue is therefore considered to be neutral in the planning balance.

- Air Quality

9.819 It has not been demonstrated that the proposed development would not have an unacceptable impact on air quality. Whilst basic air pollution mitigation is offered, DBC's ECP Team considered that the development would have a detrimental impact on local air quality. Therefore, damage costs via the DAQDCA was requested. This has not been agreed to and therefore further harm is identified, resulting in limited negative weight.

- Agricultural Land

9.820 It is considered that the development would result in the loss of BMV agricultural land that would be afforded negative weight as the permanent loss of agricultural land cannot be mitigated. This results in further harm which would be afforded limited negative weight.

- Highways

9.821 The proposed bus service infrastructure comprises a key element of the sustainable transport strategy. No formal agreement has been reached regarding the improvements to the station, which include the forecourt to facilitate the bus stop. Whilst other non-car modes of travel are available, when considering the scale of the development, it is felt that the proposed bus infrastructure is considered necessary to provide a sustainable vehicular connection to the station. The lack of this connection results in further harm which would be afforded moderate negative weight.

- Archaeology

9.822 An assessment of the archaeology on site concluded that the proposal has the potential to impact archaeological remains of a local to at most regional importance. The proposed mitigation as agreed with the county archaeologist therefore mitigates the harm. Therefore, this is considered neutral in the planning balance.

- Residential Amenity

9.823 Potential harm was identified in relation to the impact of three-storey development adjacent to the New Mill site. However, it was considered that this could be mitigated through the design and layout at reserved matters stage, thus the harm is considered to be neutral.

- Noise and Vibration

9.824 Some harm was identified regarding noise and vibration. This harm was not considered significant and not of a level that could not be sufficiently alleviated through condition/further work. As such, the harm is considered neutral in the planning balance.

Very Special Circumstances (VSCs)

9.825 As established above, the proposed development constitutes inappropriate development which is, by definition, harmful and should not be approved except in very special circumstances.

9.826 Paragraph 148 of the Framework states that: *'Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'*

9.827 Case law has clarified that it is not necessary for each individual circumstance to be sufficient to justify the development in its entirety; rather, in many cases a combination of circumstances will comprise the very special circumstances required to justify the development.

9.828 The S106 Heads of Terms and Very Special Circumstances Statement (Document 8, Revision A) outlines the positive benefits arising from the proposed development, each of which shall be considered in turn.

Housing

9.829 Paragraph 60 of the Framework discusses the Government's objective of significantly boosting the supply of homes.

9.830 The provision of housing, given the need, is a benefit where the council cannot demonstrate a five year supply. It is accepted that there is a lack of a five year supply in Dacorum. The Applicant's Housing Needs Statement asserts that DBC's housing land supply is 2.17 years. This conflicts with the recent assessment carried out by DBC's Strategic Planning Team, which has revealed a current supply of 2.5 years.

9.831 DBC's HDT Action Plan (2021) explains that Dacorum has seen a marked increase of delivery in the last five years (2016-21). Further, the 2022 HDT measurement shows that the borough has delivered in excess of the target set by Government for 2020/21, with a record year for delivery despite the impacts of the global pandemic.

9.832 The Applicant's Housing Needs Statement fails to mention the council's housing delivery programme or garage disposal programme, which, in tandem with the HDT Action Plan are contributing to improving housing delivery.

9.833 DBC's supply figure recognises that the largest schemes in the Borough, such as West of Hemel (LA3) and Spencer's Park, will deliver more in the longer term (i.e. not contributing in full in the first five years). The Strategic Planning Team note that the only comparable scheme to the application, namely LA3, is not expected to commence delivery of housing until 2025/26 where only 25 dwellings are predicted to be completed. LA3 is not expected to reach annual completion rates comparable to that proposed for this site until 2032/33. The Strategic Planning team therefore have significant doubts that the proposed delivery rates of 155 dwellings per annum from 2025 is realistic, and that its contribution towards the overall five year supply position will be negligible.

9.834 As above, the indicative phasing for delivery of the proposals suggests that 155 units would be occupied by 2025 and a further 310 units between 2025 and 2027. Timescales are not currently clear and there is potential for delay, for example, noting the lack of agreement with Thames Water regarding timescales for foul water drainage capacity. Therefore, there is uncertainty regarding the level of contribution this scheme would provide towards the five year supply. However, as there would likely be some housing benefits that could accrue as a result of the proposals and considering DBC's supply position, it is considered that very substantial weight should be attributed to this factor.

Affordable Housing

9.835 Paragraphs 62 and 63 of the Framework discusses the requirement for affordable housing within the context of delivering a sufficient supply of homes.

9.836 The provision of affordable housing is a benefit of the scheme. The proposals suggest the provision of 45% affordable homes, which is 5% greater than the usual expectation for Greenfield sites in the Borough, therefore exceeding policy requirements. The proposed mix of home ownership including first homes and affordable rent is considered acceptable.

9.837 Very substantial weight can be attributed to the delivery of affordable housing as a benefit of the scheme.

Self-Build & Custom Housing

9.838 Self-Build and Custom Housing (SBHC) is a requirement of the Framework (paragraph 62) and would be expected of large-scale strategic schemes.

9.839 It is acknowledged that there has been a limited number of schemes that include SBHC coming forward and therefore the provision for 70 self-build/custom build homes is considered as a benefit of the scheme. DBC currently has circa 205 applicants on the self-build register and there are few schemes of this scale that would provide this number of available plots. Therefore, substantial weight is attributed to the delivery of SBHC.

Housing for Older People

9.840 Paragraph 62 of the Framework identifies the need for housing for older people.

9.841 The Older Persons Need Assessment (Document 14iii) clearly identifies a need for housing for older people, which is recognised to grow over coming years. The proposals offer the potential for older persons' housing. Whilst the proposals explain the need for this type of housing, there does not appear to be specific mechanism or detail regarding delivery.

9.842 The proposed HoTs notes that *'no more than 140 units of extra care (class C2) housing may be provided on the Site.'* The Health Impact Assessment, paragraph 5.7, states that there is *'the potential for older persons housing.'* Therefore, whilst it is acknowledged that older persons housing would be a benefit of the scheme, the lack of security adds uncertainty.

9.843 Whilst not fully secured within the Applicant's written proposals, it is considered possible to add certainty to this element of the scheme via planning condition. For example, a condition for the provision of and adherence to an 'older persons housing delivery strategy'. Bearing this in mind, it is considered that the delivery of older persons housing should be attributed substantial weight.

Education Facilities

9.844 Paragraph 95 of the Framework identifies that it is important that a sufficient choice of school places is available to meet the needs to existing and new communities.

9.845 The Education Infrastructure Assessment (Document 20, Revision A) explains the limited capacity of schools within proximity to the site, with particular shortfalls in secondary education.

9.846 The VSCs Statement (Document 8a) states that the phasing of delivery (at an earlier stage) would help to meet existing and predicted future needs of Tring.

9.847 Based on the response from the Education Authority, it appears that the provision of a primary school would be feasible on the site and therefore some benefits are identified in relation to catering for the growth of Tring in terms of primary education infrastructure. However, concerns have been raised regarding the feasibility of the secondary school based on predicted pupil yields from the proposed development and uncertainty over the levels of growth in Tring.

9.848 Taking the above into account, little weight is attributed to the early provision of the primary school as it is delivering something that would be expected of this site, primarily to mitigate its own education requirements. At this stage no weight can be attributed to the provision of the secondary school, as it is unclear whether this would come forward.

Sports Facilities

9.849 Paragraph 92 of the Framework highlights that planning decisions should aim to enable and support healthy lifestyles, especially where this would address local health and well-being needs – e.g. through sports facilities.

9.850 The proposed provision of sports facilities generally meets and exceeds existing policy requirements.

9.851 The Sports and Physical Activity Strategy (Document 21) lays out an assessment of indoor and outdoor leisure facilities, including pitch provision. Table 7.3 sets out the requirements and committed provision, explaining that in several areas the proposals exceed the demand of the development, primarily in relation to the provision of football and cricket facilities based on local need. It appears that this aligns with Paragraph 92 of the Framework, which requires proposals to address local needs.

9.852 The VSCs Statement notes that the provision of sports facilities would be at an early stages of the development to cater for the wider community.

9.853 The application highlights that the provision of the sports hub relates to the emerging draft allocation for this site. Whilst the requirements of a 'sports hub' is not defined within the emerging site allocation, it is considered that a sports hub facility serving a development of this scale would be expected to provide additional facilities, rather than the basic minimum requirements. However, as the proposals are based on emerging policies and would provide a comprehensive sports hub facility, its provision at an early date is welcomed and afforded moderate weight.

Health Facilities

9.854 The Framework, Paragraph 93, requires the provision of facilities and services the community needs and take into account and support the delivery of local strategies to improve health.

9.855 The proposals would provide circa £1,800,000 towards meeting the health needs generated by the development. In addition, the proposals offer a site of up to 0.6ha of serviced land to be reserved for providing a health care facility on the site.

9.856 The suggested contribution is directly related and necessary to the development and therefore not attributed any weight in the planning balance. However, the safeguarding of land that would potentially contribute towards the local health strategy is considered beneficial. At this stage is it unclear whether this land would align with the conclusions of the health providers, as they may prefer the single-site option, which was considered more effective and would require larger site. However, as the health strategy for the area has not been fully established, it is considered that the serviced land, which could potentially help to unlock a two-site option, is considered a benefit of the scheme, afforded limited weight.

Biodiversity Net Gain

9.857 Paragraph 174 of the Framework identifies that planning decisions should contribute to and enhance the natural and local environment by providing net gains for biodiversity.

9.858 The VSC Statement highlights that the proposals are capable of resulting in up to circa 35% BNG, which could potentially increase to 39% if the enlarged SANG is brought forward. The proposed HoTs highlight the Landscape and Biodiversity Management plans shall include details of how that phase contributes towards the '*overall (minimum) target of 30% BNG.*' If secured, the uplift in BNG would be above national targets of 10%.

9.859 The Applicant notes the Rainham decision, whereby >20% was considered to attribute substantial weight. In this instance, it is considered reasonable to also attribute substantial weight to this benefit.

Suitable Alternative Natural Greenspace

9.860 Paragraph 180 of the Framework ensures that, when determining planning applications, local planning authorities have regard to protected sites.

9.861 The VSC Statement explains that the early provision of c.27ha of SANG is a significant benefit – available for new residents as well as existing residents in Tring. The further 10.4ha that could be used for other developments is also noted. This would help to offset the recognised pressures and harm currently being experienced on the CBSAC.

9.862 The delivery of SANG alongside other mitigation is mainly a product of the legal processes underpinning the Habitat Regulations. The mitigation relating to the direct impacts of the proposed development is not therefore considered to form part of the planning balance. The proposed c.27ha of SANG is therefore not attributed any weight.

9.863 A further 10.4ha has been proposed to potentially come forward to support other developments in Tring. Whilst mentioned in the proposals, no mechanism or details are provided in the proposed HoTs regarding this additional area of SANG and how it would work in practice. However, the over-provision of SANG land would serve a wider benefit, providing mitigation for other housing schemes that may currently be subject to the moratorium on progressing, or those that may come forward in the future.

9.864 At this stage it is unclear whether the proposed additional SANG would provide accelerated mitigation when compared to wider strategic mitigation proposals. This is primarily due to uncertainty over timescales. Furthermore, it is also unclear what terms would make it available to other developments, as this has not been set out in any detail within the application.

9.865 Taking all of the above into account, it is considered that the overprovision of SANG is provided limited weight.

Landscape and Biodiversity Management

9.866 Section 15 of the Framework discusses conserving and enhancing the natural environment.

9.867 Whilst the proposed BNG was afforded weight above, the management of landscape and biodiversity is not considered as an additional benefit beyond this and is therefore not attributed any material weight.

Orchards and Allotments

9.868 Paragraph 92 of the Framework encourages healthy lifestyles and the provision of allotments. Paragraph 131 promotes opportunities to provide community orchards.

9.869 The proposals indicate that allotments and community orchards would be available to existing residents in Tring, serving some wider benefit to the area. This is attributed moderate weight in the planning balance.

Energy and Sustainability

9.870 The Framework identifies that the purpose of the planning system is to contribute to the achievement of sustainable development.

9.871 The proposals indicate a fabric first approach with local air source heat pumps and on-site renewable energy production through solar panels. The proposals state that the development would deliver a 90% carbon reduction (regulated emissions) and be carbon zero ready by 2030. Whilst this is an improvement on current standards, by the time the vast proportion of housing comes forward, it is likely that the Future Homes Standard will be in effect, which requires c. 75-80% less carbon emissions. It may also be that towards the latter stages of construction, national requirements improved further through building regulations and other measures.

9.872 The commitment to providing a substantial number of homes at a higher energy efficient standard is welcomed. However, the lack of detailed investigation into a neighbourhood energy approach is questioned, as the large-scale nature of this scheme offers such opportunities. Taking this into account and that the national requirements may be at a comparable level at time of construction, only moderate weight is attributed to this benefit of the scheme.

Railway Station Improvements

9.873 Section 9 of the Framework promotes sustainable transport, highlighting that opportunities to promote public transport should be identified and pursued.

9.874 The proposals, if approved, would result in a significant increase in the population of Tring and would therefore put pressures on public transport, unless specifically mitigated. Whilst the proposed contributions towards station improvements would have wider benefits, it is considered a necessary element of the proposal to accommodate for the increased population growth. Specifically, the arrangements to the forecourt appear necessary to provide the bus service improvements.

9.875 The VSC Statement notes that the proposed station improvements would be brought forward in the development programme to ensure benefits to Tring residents, however, there does not appear to be a specific reference to the delivery and timescales in the HoTs. Furthermore, at present there is no confirmed agreement between the Applicant and West Midlands Trains regarding the financial contribution.

9.876 TN015 explains that there is no guarantee regarding the delivery of improvements on land outside the Applicant's control. The imposition of a negatively worded condition may be appropriate in this case, as it would deliver sufficient certainty for all parties. This would encourage the parties to finalise the agreement in a timely manner and would maintain transparency.

9.877 It is suggested that with the inclusion of a negatively worded condition the proposed railway station improvements would be secured. Therefore, moderate weight is attributed to this particular element of the VSC package.

Bus Service Improvements

9.878 Section 9 of the Framework promotes sustainable transport, highlighting that opportunities to promote public transport should be identified and pursued.

9.879 As identified in the Highways section, it is apparent that whilst the turning area for a small bus may be feasible within the existing station forecourt, the bus would miss the Station Road bus stop and therefore a re-design would be required.

9.880 It is acknowledged that some benefits would arise from the proposed bus service improvements if delivered. Although at this stage there is no guarantee that an agreement would be reached between the Applicant and Train Operator to facilitate the required works, the imposition of a negatively worded condition for the station improvements would add certainty. Therefore, moderate weight is attributed to this element.

Off-Site Highway, Footpath and Cycle Improvements

9.881 The Framework requires development proposals to promote walking and cycling (paragraph 104), protect and enhance public rights of way and access (para. 100) and provide attractive and well-designed walking and cycling networks (para. 106 (d)). Paragraph 110 indicates that any significant impacts from the development on the transport network should be cost effectively mitigated to an acceptable degree and paragraph 120 highlights that planning decisions should improve public access to the countryside.

9.882 Saved Policy 109 explains that development adjoining the Grand Union Canal is expected to make a positive contribution to the canal-side environment, including encouragement to improvements to pedestrian access and small-scale facilities appropriate to the canal.

9.883 The majority of works proposed are considered to mitigate the impacts of the development and provide a well-connected development. However, the VSC Statement indicates that the agreed improvements relating to the canal towpath and footpath link between Marshcroft Lane and Northfield Road provide VSC benefits.

9.884 Considering the scale of the proposals it is considered that the tow path improvements and footpath connection to the wider countryside are considered necessary to mitigate impacts that would likely accrue from the development e.g. footpath degradation. Nevertheless, these improvements would result in wider benefits and therefore moderate weight is attributed.

Public Open Space, Recreation Space and Children's Play Spaces

9.885 The Applicant has considered the findings of the Open Spaces Standards Paper (OSSP). They explain that the OSSP identifies minor gaps in play provision for children and young people and that this may be served by improvements to existing provision in the north-west of Tring. The proposed play spaces and gardens that meet the needs of the new residential development may therefore also contribute to identified gaps in provision across Tring.

9.886 Considering the location of proposals in relation to the existing settlement, it is considered that only a small number of properties would directly benefit from the proposed open, recreation and play spaces. There would be some overall wider benefit arising from the additional spaces and therefore limited weight is attributed to this benefit.

10. CONCLUSION

9.887 Section 38(6) of the Planning and Compulsory Purchase Act 2004) requires that applications are determined in accordance with the development plan unless other material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,
- b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
- c. Any other material considerations

9.888 The council is currently unable to demonstrate the required five year supply of deliverable housing sites. As set out in this report, DBC can demonstrate 2.5 years supply. In the absence of an up-to-date five year supply and in accordance with paragraph 11 of the Framework, there is a presumption in favour of sustainable development.

9.889 As the site lies within the Green Belt, the Framework, paragraph 11(d) applies. This requires planning permission to be granted unless the application of policies in the Framework provides a clear reason for refusing the development proposed. It is necessary to apply the development control tests relating to the Green Belt in particular to ascertain whether these provide a clear reason for refusal.

9.890 There are relevant development plan policies that apply to this application, the following of which are considered most important in this determination: Policies CS5, CS10, CS11, CS12, CS13, CS24, CS25, CS26, CS27 and CS29 of the Dacorum Borough Core Strategy (2013) and saved Policies 97, 102, 103 and 108 of the Dacorum Borough Local Plan (2004).

9.891 The overall suite of development plan policies are considered up-to-date and therefore the tilted balance, as set out in paragraph 11(d) of the Framework, is not engaged and the S38(6) balance is followed.

9.892 The Framework states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. These will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

9.893 The proposals do not fall within the exceptions specified in paragraph 149 (a-g) of the Framework and therefore considered inappropriate development.

9.894 The Applicant has based their application proposals on the draft site allocation in the draft emerging Plan that has currently been deferred until further evidence has been gathered. It is likely that further emphasis will be put in brownfield sites within existing settlements to reduce pressure on the Green Belt, which is key to Government policy. As such, at this stage very limited weight can be given to the draft allocation.

9.895 The balancing exercise above has set out all of the harms associated with the proposal, all of the benefits and all of the other material planning considerations. The VSC case above provides a number of additional benefits on top of the draft emerging policy requirements in an attempt to overcome the very substantial level of harm to the Green Belt. Other harm has also been identified – particularly in relation to landscape and visual impacts, the Chilterns Beechwoods SAC, ecology, heritage, air quality, agricultural land, highways, archaeology, residential amenity, noise and vibration – some of which has been mitigated through design and other measures.

9.896 Considering the assessment above, it is concluded that Green Belt harm and other harms are not clearly outweighed by all of the benefits and therefore very special circumstances do not exist in this case. It is also noted that if the Applicant's assessment regarding DBC's land supply of 2.17 years was accepted, the identified harm is not clearly outweighed.

9.897 The application of policies in the Framework provide a clear reason for refusing the development proposal under paragraph 11(d)(i). It is concluded that the proposals are in conflict with the development plan policies in so far as they relate to the Green Belt, Chilterns Beechwoods SAC, landscape and visual impacts, ecology, heritage, air quality, agricultural land, highways and archaeology.

9.898 Taking all of the above into account, it is recommended that permission be refused for the reasons set out below.

11. RECOMMENDATION

11.1 The proposal is recommended for refusal for the reasons listed below.

Reason(s) for Refusal:

- 1. The proposed development would constitute inappropriate development and would result in spatial and visual harm to the openness of the Green Belt. In addition, the proposals would lead to a conflict with one of the five purposes of including land in the Green Belt i.e to assist in safeguarding the countryside from encroachment. The benefits of the scheme taken together do not clearly outweigh the harm and other harm identified. Very special circumstances have not been demonstrated to justify the proposed inappropriate development in the Green Belt. The proposals are therefore**

contrary to the Policy CS5 of the Dacorum Borough Core Strategy (2013) and paragraphs 137, 138, 147, 148, 149 and 150 of the National Planning Policy Framework (2021).

2. The application does not provide suitable management arrangements for the proposed Suitable Alternative Natural Greenspace (SANG). Details relating to the procurement of a suitable management company are lacking and the proposals do not deal with the possibility that the procured company becomes insolvent or fails to discharge its obligations. Consequently, there is a lack of certainty that the proposed mitigation would be secured in perpetuity to mitigate the recreational impacts on the Chilterns Beechwoods Special Area of Conservation and the council cannot rule out that the proposal alone or in combination with other plan and projects would not result in likely significant effects to the Chilterns Beechwoods SAC that would adversely affect its integrity. The proposal therefore fails to comply with saved Policies 102 and 103 of the Dacorum Borough Local Plan (2004), Policies CS26 and CS29 of the Dacorum Borough Core Strategy (2013) and paragraphs 174, 176 and 180 of the National Planning Policy Framework (2021).
3. A suitable financial sum has not been agreed in relation to Strategic Access Management and Monitoring (SAMM) to mitigate recreational pressure on the Chilterns Beechwoods Special Area of Conservation (CBSAC). It cannot therefore be concluded that the proposals would not result in an unacceptable impact on the CBSAC due to increased recreational pressure, contrary to the requirements of saved Policies 102 and 103 of the Dacorum Borough Local Plan (2004), Policies CS26 and CS29 of the Dacorum Borough Core Strategy (2013) and paragraphs 174, 176 and 180 of the National Planning Policy Framework (2021).

Informatives:

1. Planning permission has been refused for this proposal for the clear reasons set out in this decision notice. The Council acted pro-actively through positive engagement with the applicant in an attempt to narrow down the reasons for refusal but fundamental objections could not be overcome. The Council has therefore acted pro-actively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) (Amendment No. 2) Order 2015.

APPENDIX A: CONSULTEE RESPONSES

Please note that some consultee responses included images and tables that have not pulled into this document. The full responses, including all of the images and tables can be found within the full consultation responses by searching for the local planning authority reference number (22/01187/MOA) on planning public access on Dacorum’s website.

Consultee	Comments
<p>Environmental And Community Protection (DBC) – Air Quality</p>	<p>Please note that this memo relates only to local air quality issues.</p> <p>Having reviewed the application documents, in particular:</p> <ul style="list-style-type: none"> o Transport Assessment (March 2022) o AQC Air Quality Report within Chapter 11 of the Environmental Statement (Vol. 1) (and the 'G' Appendices) o Framework Travel Plan (March 2022) o Framework Construction Environmental Management Plan (March 2022) o DAS o Planning Statement o Associated Plans o Application Form <p>I have the following requirements for additional information and clarifications:</p> <p>AQC Air Quality Assessment Report:</p> <p>1) The report has only been run for 2027, with reference in the report (section 11.4.27) to 2027 representing worst case because of the combination of peak construction traffic and a fully operational development. However, it is apparent from the Construction Transport Management Plan that the development will only be completed by 2032 (or according to the Transport Assessment by 2036). More specifically by 2027 it is estimated that only 400 of the 1,400 homes will have been built.</p> <p>Therefore, it will be necessary for the AQ Assessment Report to include 2032 as an output year in addition to 2027.</p> <p>2) It is noted from the Transport Assessment Report that:</p> <ul style="list-style-type: none"> a. A4251 (which passes through the Northchurch AQMA) is a strategic route linking Tring/the development site to Watford and the M25 b. Estimated external trip distribution from the site (to destinations to the south - assumed via A41 or A4251) totals 47% (Berkhamsted representing 11.5% of that total). So based on only the residential trips

(1,394) totalled in Table 8.9 that could equate to 661 a day, of which 153 might be expected to be travelling through Northchurch / Berkhamsted. Table 8.11 suggests 9%, rather than 11.5%, which would be 125 extra trips a day.

This increase is greater than the indicative criteria for requiring an air quality assessment (EPUK/IAQM 2017) which is stated as "a change of LDV flows of more than 100 AADT within or adjacent to an AQMA". It is also noted from the Biodiversity Air Quality Assessment that the traffic predicted to be travelling through Northchurch has been judged sufficient to assess the impact on the No-Man's Friend Wood (Ancient Woodland).

Given that there is an AQMA located on the A4251, a recognised strategic route leading from the development site that is estimated to give rise to between 125-150 extra car journeys a day on that route, there is insufficient justification for not assessing the air quality impact of the development on the AQMA in Northchurch. Therefore, the updated AQ Assessment Report should include an assessment of air quality at representative sensitive receptors within the AQMA.

3) It is unclear from section 7.3 of the Transport Assessment, in particular Section 7.3.5, whether the final COMET modelling run has been completed for the proposed development site.

On the assumption that it has yet to be completed it will be necessary for the AQ Assessment to refer to the most recent run of the COMET model and re-run the AQ Assessment with any new traffic data and include it in the updated report

4) Having considered the outputs of the submitted air quality assessment it is required that the Defra Air Quality Damage Cost Appraisal is applied to the key road links associated with a reduction in local air quality at relevant receptors. For example, Station Road (link containing receptor E6), Cow Lane (link containing receptor E18), B4635 (link containing receptors E19-E20).

Outputs from the application of the above should be included within the AQ Assessment. Alongside which a commitment should be made that the value of any calculated damage costs (if any) are made available to DBC for investment in measures, over and above those those sustainable travel measures already promised, to mitigate the air quality impact of the proposed development.

Of lesser significance than the above, but something that will need to be committed to at this stage of the process is the following:

5) The Framework Construction Environmental Management Plan

includes a section on 'General Types of Plant and Equipment' (3.8.9 - 3.8.11), but there is no mention within it about requiring the use of non-road mobile machinery of a standard that reasonably minimises air pollution emissions (by reference to Stage I - Stage V standards).

A commitment to require non-road mobile machinery that reasonably minimises air pollution emissions should be included within the construction management plan.

6) Whilst it is recognised that the construction traffic routes have yet to be finalised and as such that a Construction Traffic Management Plan cannot yet be submitted, it is considered reasonable to expect that the following commitments would have been made at the application stage.

- Prevent construction traffic from travelling to or from the development site via the Northchurch AQMA.

- Require EURO VI as the minimum acceptable engine standard for HGV and LGV contracted to the development.

Commitment to the inclusion of the above within the future Construction Traffic Management Plan.

7) The operational travel plan should have provision for baseline surveys, measures and targets associated with ultra-low emission vehicle (ULEV) ownership and electric vehicle charging points.

Commitment to the inclusion of the above within the future Operational Travel Plan.

Until the above issues are addressed I am unable to agree with the conclusions of the AQ Assessment and so it will be necessary to object to the proposed development on the basis of having insufficient information.

In the event that above issues are appropriately addressed and the updated report is judged sufficient to remove any local air quality based objection to the proposed development it is likely that the following, not necessarily exhaustive, local air quality conditions will be recommended should permission be granted.

Local Air Quality Conditions:

Condition 1 - Construction Traffic Management Plan:

No development approved by this permission shall be commenced

prior to the submission to, and agreement of the Local Planning Authority, of a Construction Traffic Management Plan that is relevant to the demolition, earthworks and construction phases of the proposed development. In addition to those commitments outlined in Section 3.10 of the Stantec Framework Construction Environmental Management Plan (Ref: 332110605/300.6 March 2022) this should include a commitment to:

- Prevent construction traffic from travelling to or from the development site via the Northchurch AQMA.

- Require EURO VI as the minimum acceptable engine standard for HGV and LGV contracted to the development.

Reason: To support improvements in identified Air Quality Management Areas and ensure that the local air quality standards are maintained throughout the area in accordance with Core Strategy (2013) Policy CS32 and Emerging Local Plan Policy DM35.

Condition 2 - Construction Environmental Management Plan:

No development approved by this permission shall be commenced prior to the submission to, and agreement of, the Local Planning Authority, of a Construction Environmental Management Plan that is relevant to the demolition, earthworks and construction phases of the proposed development. In addition to those commitments outlined within the Stantec Framework Construction Environmental Management Plan (Ref: 332110605/300.6 March 2022) this should include a commitment to:

- Require non-road mobile machinery that reasonably minimises air pollution emissions

Reason: To support improvements in identified Air Quality Management Areas and ensure that the local air quality standards are maintained throughout the area in accordance with Core Strategy (2013) Policy CS32 and Emerging Local Plan Policy DM35.

Condition 3 - Operational Phase Travel Plan:

At least 3 months prior to the first occupation of the approved development a detailed Travel Plan for the site, based upon the Stantec Framework Travel Plan (Ref: 332110605 - 003 - March 2022) but updated to:

- o include the collection of pre-occupation baseline information on:
- o availability of public EV charging provision within Tring and Berkhamsted/Northchurch
- o ownership of Ultra Low Emission Vehicles (ULEVs)

- o commit, at relevant phase of occupation of the development, to obtain baseline information from occupiers about:
 - o awareness of ULEVs
 - o ownership of ULEVs
 - o include resources to raise awareness of ULEVs
 - o include measureable targets for ULEV uptake throughout the lifetime of the Travel Plan
 - o assess the viability of the proposed on-site car club having dedicated EV vehicles

Reason: To support improvements in identified Air Quality Management Areas and ensure that the local air quality standards are maintained throughout the area in accordance with Core Strategy (2013) Policy CS32 and Emerging Local Plan Policy DM35.

Informative to Conditions 1 - 3:

The above conditions are considered to be in line with paragraphs 105, 174(e) and 186 of the NPPF 2021.

FURTHER COMMENTS RECEIVED 10.08.22

Further to my memo dated 6th June 2022 and following a review of the Air Quality Note - Marshcroft, Tring (July 2022) (Job ref: J10/12494D/10) submitted with the July 2022 re-consultation of 22/01187/MOA, I have the following updates to my advice and recommendations:

AQC Air Quality Assessment Reporting:

- 1) An air quality assessment for a year post 2027 will not be required. This is based on the reassurance provided by AQC that the occupancy traffic derived from a fully occupied site has been brought forward and modelled for 2027 so that the peak occupancy traffic coincides with presumed peak construction traffic to present an estimated worst case scenario.
- 2) The inclusion of an air quality assessment for sensitive receptors within the Northchurch AQMA is acknowledged.
- 3) The updating of the air quality assessment modelling to account for the COMET modelled traffic data is acknowledged.
- 4) Having considered the outputs of the submitted air quality assessment it is still required that the Defra Air Quality Damage Cost

Appraisal is applied to the key road links associated with a modelled reduction in local air quality at relevant receptors. For example, Station Road and Cow Lane (links containing receptors E6 and E9), and the B486, B488 and Tring Ford Road (links containing E35-E40). And in Northchurch, the High Street link containing receptors R1 - R5).

Outputs from the application of the above should be submitted to the LPA. Alongside which a commitment should be made that the value of calculated damage costs (if any) are made available to DBC for investment in measures, over and above those sustainable travel measures already promised, to mitigate and/or measure the air quality impact of the proposed development.

5) The Framework Construction Environmental Management Plan includes a section on 'General Types of Plant and Equipment' (3.8.9 - 3.8.11), but there is no mention within it about requiring the use of non-road mobile machinery of a standard that reasonably minimises air pollution emissions (by reference to Stage I - Stage V standards).

A commitment to require non-road mobile machinery that reasonably minimises air pollution emissions should be included within the construction management plan.

6) Whilst it is recognised that the construction traffic routes have yet to be finalised and as such that a Construction Traffic Management Plan cannot yet be submitted, it is considered reasonable to expect that the following commitments would have been made at the application stage.

- Prevent construction traffic from travelling to or from the development site via the Northchurch AQMA.
- Require EURO VI as the minimum acceptable engine standard for HGV and LGV contracted to the development.

Commitment to the inclusion of the above within the future Construction Traffic Management Plan.

7) The operational travel plan should have provision for baseline surveys, measures and targets associated with ultra-low emission vehicle (ULEV) ownership and electric vehicle charging points.

Commitment to the inclusion of the above within the future Operational Travel Plan.

With the adjustments and additions to the original Air Quality Assessment that have been submitted within the July 2022 Air Quality Note it is possible to withdraw the objection to the proposed development based on local air quality concerns.

However, all of the following local air quality conditions should be included within any permission that is granted. There should also be a binding agreement in place to require a Defra Air Quality Damage Cost Appraisal to be undertaken for submission to, and agreement by, the LPA.

Local Air Quality Conditions:

Condition 1 - Construction Traffic Management Plan:

No development approved by this permission shall be commenced prior to the submission to, and agreement of the Local Planning Authority, of a Construction Traffic Management Plan that is relevant to the demolition, earthworks and construction phases of the proposed development. In addition to those commitments outlined in Section 3.10 of the Stantec Framework Construction Environmental Management Plan (Ref: 332110605/300.6 March 2022) this should include a commitment to:

- Prevent construction traffic from travelling to or from the development site via the Northchurch AQMA.
- Require EURO VI as the minimum acceptable engine standard for HGV and LGV contracted to the development.

Reason: To support improvements in identified Air Quality Management Areas and ensure that the local air quality standards are maintained throughout the area in accordance with Core Strategy (2013) Policy CS32 and Emerging Local Plan Policy DM35.

Condition 2 - Construction Environmental Management Plan:

No development approved by this permission shall be commenced prior to the submission to, and agreement of, the Local Planning Authority, of a Construction Environmental Management Plan that is relevant to the demolition, earthworks and construction phases of the proposed development. In addition to those commitments outlined within the Stantec Framework Construction Environmental Management Plan (Ref: 332110605/300.6 March 2022) this should include a commitment to:

- Require non-road mobile machinery that reasonably minimises air pollution emissions

Reason: To support improvements in identified Air Quality Management Areas and ensure that the local air quality standards are maintained throughout the area in accordance with Core Strategy (2013) Policy CS32 and Emerging Local Plan Policy DM35.

Condition 3 - Operational Phase Travel Plan:

At least 3 months prior to the first occupation of the approved development a detailed Travel Plan for the site, based upon the Stantec Framework Travel Plan (Ref: 332110605 - 003 - March 2022) but updated to:

- o include the collection of pre-occupation baseline information on:
 - o availability of public EV charging provision within Tring and Berkhamsted/Northchurch
 - o ownership of Ultra Low Emission Vehicles (ULEVs)
- o commit, at relevant phase of occupation of the development, to obtain baseline information from occupiers about:
 - o awareness of ULEVs
 - o ownership of ULEVs
 - o include resources to raise awareness of ULEVs
 - o include measureable targets for ULEV uptake throughout the lifetime of the Travel Plan
- o assess the viability of the proposed on-site car club having dedicated EV vehicles

Reason: To support improvements in identified Air Quality Management Areas and ensure that the local air quality standards are maintained throughout the area in accordance with Core Strategy (2013) Policy CS32 and Emerging Local Plan Policy DM35.

Informative to Conditions 1 - 3:

The above conditions are considered to be in line with paragraphs 105, 174(e) and 186 of the NPPF 2021.

FURTHER COMMENTS RECEIVED 22.08.22

Further to our MS Teams communications on the 18th and 19th August 2022 I have the following comments in response to the opinion from the developer that the use of the Defra Air Quality Damage Cost Appraisal is not justified for this application.

Below are the various policies and guidance that I considered in asking for the Defra Air Quality Damage Cost Appraisal:

CS32 in the current DBC Local Plan:

'Developments will be required to help support improvements in identified AQMAs and maintain air quality standards throughout the area'

Pros:

The development will result in a reduction in air quality within the current AQMA at Northchurch compared to if the development were not be permitted.

The development will result in a reduction in air quality in areas of Tring compared to if the development were not to be permitted.

Cons:

The AQMA at Northchurch is likely to be revoked in the next 12-24 months and the air pollution modelling run for the application predicts concentrations to be comfortably below the relevant air quality objections in Northchurch even after full occupation of the proposed development.

'Maintain air quality standards throughout the area' could be interpreted to mean, should prevent a worsening of air quality from present situation, or equally that it should not result in a breach of any air quality standards e.g. published air quality standards and objectives. In the latter case the proposed development would not result in such a breach.

There is no DBC Air Quality Planning Guidance Document or a DBC Air Quality Supplementary Planning Document in place to provide any interpretation of the air quality aspects of CS32 or to specify DBC's expectations of developers in meeting the requirements of CS32.

NPPF (2021)

Para. 57 - Planning obligations:

- a) Necessary to make it acceptable
- b) Directly related to the development
- c) Fair and reasonably related in scale and kind to the development

Pros:

Any damage costs could be easily invested in projects to offset the air pollution impact of the development

The scale and nature of the development is such that the damage costs would be fair and reasonable.

Cons:

We have not objected to the development at this stage because of the 'negligible' scale of the worsening in local air quality based on the results of the air quality impact assessment and use of the only published guidance available (IAQM/EPUK Air Quality Planning Guidance 2017) to assess scale of worsening of air quality. However, this lack of objection reflects the expectation of the specified conditions being applied to any permission and that there will be further commitment to air quality mitigation via the damage costs payments.

Para. 174 (e) - Planning policies and decisions should contribute to and enhance the natural and local environment by:

(e) Development should, wherever, possible, help to improve local environmental conditions such as air quality...

Pros: Basic air pollution mitigation is offered, but the development as a whole will result in a detrimental impact on local air quality.

IAQM/EPUK Air Quality Planning Guidance 2017

The use of Defra's Air Quality Damage Cost Appraisal is not specified in this document, but it does identify Regional Guidance, such as the West Yorkshire Air Quality and Emissions Planning Guidance that does incorporate that Appraisal as part of its expectations for Major Developments. I am also aware of it being used in the Guidance documents produced for several Hertfordshire Local Authorities.

Summary:

From a non-planning perspective I consider the biggest issue to be the lack of any local air quality guidance to support the interpretation of and expectations required from CS32.

The 'necessary to make it acceptable' point (Para 57) is also an issue given that we have not objected, although strictly speaking at this stage we have not objected because of the expectation that there will be additional air quality mitigation possible by way of the money obtained from the application of the Air Quality Damage Cost Appraisal.

I trust that this reflects and builds on our discussions, but if you have any questions please let me know.

<p>Hertfordshire Highways (HCC)</p>	<p>Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:</p> <p>COMMENTS:</p> <p>The applicant seeks planning permission for the following development:</p> <p>Hybrid application (with access details of two main access points from Bulbourne Road and Station road in full and the main development on the rest of the site in outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 use class C2 dwellings); a new local centre and sports /community hub, primary school, secondary school, and public open spaces including creation of a suitable alternative natural green space</p> <p>Reasons:</p> <p>We recommend this planning application is refused for the following reason:</p> <p>The proposal fails to comply with Hertfordshire County Council's Local Transport Plan policies relating to sustainable development and safety (policies 1, 5)</p> <p>Introduction</p> <p>The Highway Authority note the submission of the above major planning application, located on the eastern edge of Tring.</p> <p>The applicant's transport consultant has engaged the Highway Authority in pre-application advice concerning highways and transportation matters, including the scope of the assessment work.</p> <p>Sustainability</p> <p>Chapter 3 of the Transport Assessment (TA) sets out the accessibility of the site to public transport facilities. As noted within the TA, bus stops are available on Station Road and Bulbourne Road, although given the scale of the development site, are located well outside of a 400m walking distance.</p> <p>Tring railway station is quoted as being approximately 600m from the southern corner of the site, although when measured from the site</p>
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centre is approximately 1.7km away.

The site's position on the outskirts of Tring, combined with its significant scale, makes the provision of excellent public transport within the site essential. Efficient pedestrian, and cycle links compatible with LTN 1/20 standards to/from Tring railway station are also of key importance.

In terms of access to local facilities and amenities, Chapter 4 details those closest to the site. As noted in Table 4.1, Tring High Street/Tring Town Centre and stated to be 1.6km/1.8km away from the site respectively. Some other facilities, notably education may be accessed within 0.68km to 1.5km away as set out in the table.

As set out above, the site is relatively isolated given its scale and its position on the outskirts of Tring. This is illustrated clearly in the distance to key local facilities and amenities, a majority near the cusp normal acceptable distances. Whilst with a development of this scale, it is noted that some facilities and amenities are proposed in accordance with the development mix, ease of accessibility to Tring via active modes and public transport will be of highest priority. The Highway Authority therefore seeks in accordance with LTP4 Policy 1 measures can ensure residents have highest quality infrastructure to encourage greater use of non-car modes.

Public Transport

Bus

Chapter 11 of the TA details a possible standalone bus service. The Highway Authority considers it essential that a bus is provided to a site of this scale, especially given the position of the development relative to key destinations.

Figure 11.2 reproduced below provides an illustration of a possible bus service. The Highway Authority is content to agree that a standalone route is the most suitable option.

The Highway Authority note the submission of the Bus Service Strategy Technical Note, as contained within Appendix N of the TA.

Amendments to Current Services

The Highway Authority note that only Arriva Service 500 has the desired frequency of the developers.

However, it is considered that the Red Eagle 387/389/397 services

could be integrated into the new service. This would increase the profile of the service and its potential revenue stream.

As part of this, Wigginton and Aldbury could be integrated into the already proposed Demand Responsive Transport plan for the Dacorum area.

Tring Station

It is agreed that a stop could be placed in the station forecourt itself, although parking restrictions would probably need to be enforced. However, at this stage it has not been demonstrated that the changes necessary to the station forecourt are in control of the applicant. Naturally, the changes are required to deliver this key addition to the overall picture.

Tring Town Centre

The Highway Authority is in agreement that the side roads are unsuitable. However, there is concern that the proposed terminal loop is also unsuitable, especially with this frequency. Of particular concern is Goldfield Road.

Timetable

The calculation for operating speed is satisfactory.

However, it is considered that the operation of a 20-minute headway from 05:00 in the morning is optimistic at best. Again, the headway on a Sunday may be considered excessive.

It is suggested that a timetable of this frequency would be better served by incorporating more areas within the town.

Hours of Operation

Clarification is requested as the Highway Authority has found that the hours of operation are less than the calculated hours, which should be 11479.70 hours.

Costing Model

The costing model is well-designed, thought out and calculated. However, the following observations are made:

The Highway Authority would calculate 'Variable' costs in two sections: Driver Cost (calculated by the hour), and Fuel Cost (calculated by the

mile).

While staffing costs are calculable by the hour, a fuel calculation in this way could lead to inaccuracies. Costing fuel by the hour infers that the bus never stops and never operates at different speeds or distances.

The Highway Authority has found that the remaining semi-variable costs would normally drop into a 'fixed cost' bracket, calculated by number of vehicles required.

Demand

The strategy states that demand will come from two sources:

Trips made by residents of the new development, and Trips made by the existing population of Tring, attracted to the improved public transport proposition offered by the new service. However, the Highway Authority has some doubts that without linking the other areas of Tring directly, there would be sufficient increase in patronage. It is agreed that the current level of public transport usage in Tring of 1% is extremely poor, especially compared to the national average of 6%. However, this is down to the overall poor operation of services in the town and therefore, other areas need to be considered.

Revenue

The fares in the table are extremely attractive.

Table 11 - Annual Cost and Revenue.

While the revenue figure increases year by year, the costs remain the same. This is misleading as costs remaining the same is impossible. Factors need to be considered to account for the increase in costs.

The Highway Authority recommend that engagement is undertaken also with HCC's bus planning team.

Walking and Cycling

To Tring Railway Station

Drawing number 332110605/5500/011/D illustrates a proposed cycle route which seeks to provide a route towards Tring railway station.

The drawing shows the existing shared pedestrian/cycle route on Station Road being pulled into the site curtilage.

Whilst such a route is welcomed, it is not clear how the totality of the necessary route may operate. The Highway Authority would seek a more fulsome approach looking at the entire corridor and how cycling may be achieved from Tring town centre to the railway station. At present, the drawing only illustrates a limited section of the route that is necessary in order to facilitate walking and cycling trips on the site's southern boundary.

Notwithstanding any constraints on the route towards Tring railway station, it is considered that more detailed work should be undertaken on the feasibility of improving the existing connections to the train station.

To Tring town centre

As noted in the TA, "The proposed vehicular access to Bulbourne Road will also deliver pedestrian facilities to the north of the site. A footway will be provided along the southern side of Bulbourne Road as illustrated on Stantec Drawing 332110605/5500/003/F. The footway continues to tie in with the existing footway provision to the west of the site adjacent to the residential properties."

The TA alludes to pedestrian links via Marshcroft Lane and internally within the site. However, with respect to the former and the wider access requirements of the site, a more detailed audit of pedestrian facilities to and from Tring town centre has not been provided.

The Highway Authority has concerns that a comprehensive walking and cycling audit has not been undertaken. This may be undertaken using the PERS methodology, or similar. Account should also be made of the Berkhamsted and Tring Sustainable Transport Study (Dacorum Borough Council, November 2021), in terms of the sustainable and active travel measures proposed for the town, as illustrated on the figure below:

The Highway Authority is concerned that the site has been taken very much in isolation, with a package of sustainable transport measures that are limited in scope and lack a truly cohesive overall picture of truly supporting sustainability. This includes Marshcroft Drive not being examined as an Active Travel route and no details of how pedestrian/cyclist facilities on both Station Road and Bulbourne Road tie into the existing network. Moreover, with respect to the latter, on Station Road, more detail is required of how pedestrians and cyclists may access Tring Station. Given the size of the site, a corridor approach is warranted.

Access

The Highway Authority note the submission of drawings illustrating the site access points.

Drawing number 332110605/5500/011/D illustrates the proposed signalised junction from Station Road.

It is noted that to facilitate this access point, the applicant is seeking a reduction in the speed limit from 60 m.ph. to 40 m.ph.

The Highway Authority notes that such a proposal will need to comply with HCC's Speed Management Strategy, which includes the fundamental requirement of speed limits to be self-enforcing, largely influenced by environment. Through the pre-application process, the Highway Authority notes that in order to achieve a reduction in speed on Station Road substantial changes would be necessary in order to alter the road's rural character. From the indicative masterplan submitted, it does not appear, for example, that any active frontage is to be provided, with even the proposed shared footway/cycleway set well back into the site which runs parallel to Station Road.

The submission of the junction as presently shown, with a reduction in speed to 40 m.p.h. is unlikely to be supported by HCC and therefore leads to doubts with respect to satisfying design criteria required.

The access as proposed is a substantial junction. The Highway Authority has some concern as to how over-engineered the junction is as shown on the proposed design. The size of the junction is very much a highway capacity based solution.

The inclusion of a crossing to the south side of Station Road is also requested given that there are a number of facilities on this side of the road and could constitute a pedestrian desire line. The south side of the road is home to a number of leisure and sporting facilities.

Drawing number 332110605/5500/003/F illustrates the proposed access from Bulbourne Road. The drawing illustrates a ghost island right turn priority controlled T junction.

The Highway Authority has some concern with respect to the pedestrian and cyclist facilities on this plan.

The turn into the crossing facility should have a larger radius.

It is considered that the cycle route could be extended further from its presently shown point which is only a short section of off-road route.

On the south side, the footway cycleway could be brought back to within the visibility splay, with a verge implemented behind on the south. This would secure the visibility splay but also allow a buffer between the road and the share footway/cycleway.

On the above plan there are also no details of how the route provides a crossing from the south to the north side, given that a footway is not present on the entirety of the given section of Bulbourne Road. The submitted drawing does not give sufficient detail of how the proposed footway on the south will tie in with the existing provision, which in itself is limited in terms of width and quality.

It is noted that in order to facilitate one of the principal north-south routes through the site it will be necessary to alter Marshcroft Lane. The latter runs east west through the centre of the site. Paragraphs 5.5.3 and 5.5.4 set out the proposals.

5.5.3 "When the proposed development is delivered Marshcroft Lane will be bisected by Main Street which will run north to south through the site. At this point, it is proposed to redesignate the western section of Marshcroft Lane within the development for use by pedestrians and cyclists, with vehicle use being prohibited."

5.5.4 "This will be controlled via the use of bollards at either end of the affected section of Marshcroft Lane. This will prevent vehicular entry to the site from the western end of Marshcroft Lane via Grove Road, and provide an amenity improvement to the residents in this location as they will no longer have vehicles through routeing past their homes."

Clearly this route is a key feature of the proposal, the Highway Authority requires detailed plans of this access layout to be submitted as part of the planning application and the details of the required traffic regulation order required to underpin delivery.

Assessment

The Highway Authority has undertaken an assessment of the modelling submitted for the proposed application.

The Highway Authority note the details of the assessment work as contained within the TA and also the Transport Assessment Addendum, dated June 2022.

The Highway Authority requested further technical information regarding the Station Road/Site Access junction. It is considered that a dedicated right turn stage into the site is necessary. Details of such

a measure were provided in an email to the Highway Authority dated 1 June 2022.

It is noted that from the models submitted via the 1 June 2022 email, a 40mph speed limit (Option 1) is shown to be just working in 2036 (PRC = 0.9%) and to keep it working in 60mph (Option 2), and actually improve it slightly (PRC = 2.2%), the consultant has increased the cycle time from 90 to 110 secs. The 1 June submission, however, shows that the junction works well with a 90s cycle and a separately signalled right turn in 2027 (Option 2) (PRC = 43.5%) and it is not until 2036 that it comes close to capacity (PRC 2.2%) with a need to increase the cycle time.

However, it is not clear if the option with the speed limit remaining at 60 mph forms a part of the submission, although it does appear within the Scoping Note.

With respect to the localised junction modelling on the wider local highway network, supported also by the COMET model run, the Highway Authority is content with the analysis presented.

Off-Site Highways Infrastructure

The following off site mitigation is proposed:

Stantec Drawing 332110605/5500/010 - Indicative Tring Railway Station Forecourt Enhancements

Stantec Drawing 332110605/5500/012 - London Road / Station Road Proposed Mitigation Scheme

Stantec Drawing 332110605/5500/013 - Grove Road / Station Road / Cow Lane Proposed Mitigation Scheme

Stantec Drawing 332110605/5500/014 - Cow Lane / A4251 Proposed Mitigation Scheme

The junction changes represent major changes, as the amendments are highlighted necessary to overcome capacity problems naturally the design focus of increasing vehicle movement. We would direct the applicant to the emphasis of our Transport Plan's leading policy that requires user hierarchy to prioritise active modes. Therefore, although we understand the objective of the applicant is to overcome capacity, greater priority must be provided to cater for increased pedestrian and cycling facilities. The junction changes must be fully integrated into the wider transport strategy for Tring. In addition, off-site highways mitigation works should also be subject to Road Safety Audit to ensure delivery is feasible.

It is noted that in terms of the wider access requirements, such as illustrating at a corridor level, improvements from the site to connect

into Tring railway station and Tring town centre are not fully detailed within the application materials.

Travel Plan

As this development is a large mixed-use development with multiple occupants, an overarching Framework Travel Plan will be required. The applicant has submitted a Framework Residential Travel Plan. At this outline stage, the Framework Travel Plan is acceptable, although prior to first occupation, should be updated (in consultation with Hertfordshire's Travel Plan team), to accord with our guidance.

In conjunction with the above Framework Travel Plan, the Highway Authority will require Full Travel Plans, including an updated Residential Travel Plan to be submitted for each constituent part of the development.

The residential development will require a Full Travel Plan and £6,000 Evaluation and Support Fee and should be secured by Section 106 agreement in accordance with Hertfordshire County Council's Travel Plan Guidance for Business and Residential Development. This should incorporate measures to promote sustainable transport, an appointed travel plan coordinator and an appropriate monitoring programme.

Full guidance is available at:

www.hertfordshire.gov.uk/travelplans, or for more guidance contact: travelplan@hertfordshire.gov.uk.

The Plan should include targets that will be assessed using surveys and which monitor actual trip generation against the predicted trips (including trips by modes) as identified in the TA to confirm the effectiveness of the mitigation measures identified in the Travel Plan.

Where constituent parts of the development, for example, individual residential Travel Plans for parcels are sufficiently large enough to require their own Travel Plans, monitoring will be agreed taking into account the phasing of development.

The following points are typical survey requirements.

Surveys to include:

- i. An ATC at each of the entrances to the development;
 - ii. A questionnaire survey to determine how people are travelling;
- and

iii. Usage statistics for the bus service.

Monitoring would be undertaken 9 months from the occupation of the 1st dwelling and repeated every 12 months for a period of 5 years.

In support of the Travel Plan, residents will be encouraged to make use of the bus service, through the provision of initial free travel. It should take the form of the provision of Travel Vouchers to claim an initial three-month free travel on the bus service, on the basis of one ticket per household. The cost of such provision is estimated at £147,000 to be secured via a S106 agreement (this may be negotiated in conjunction with Arriva). This excludes an additional figure for marketing and printing of the vouchers.

The travel vouchers would be redeemed with Arriva. It is estimated that a three-month voucher would cost £210 (pooled vouchers), multiplied by the total number of residential units. The vouchers would be for individual journeys and could be pooled across a household. This is considered sufficient to allow all members of a household to try using the bus a number of times.

School Travel Plan

Travel plans that are created for schools are for nursery, primary, middle, secondary and independent schools. The primary school will require its own School Travel Plan. School Travel Plans are subject to a separate charging schedule.

The Full Travel Plan should provide an analysis of transport conditions at the proposed site and how pupils are expected to travel. This should include maps of catchment area and expected home locations of pupils and maps of the main access routes from these areas. It should set targets, measures and objectives for new site (to be included in S106 conditions). Furthermore, it should identify measures to be taken during the build and promotion of the new school to mitigate car use, facilitate sustainable travel, address road safety concerns and progress the targets set in the travel plan. The following requirements are noted:

- i. Commit to complete a Full Travel Plan for the new site within 12 months of occupation (S106 condition);
- ii. Design and Access Statement and movement diagram;
- iii. Details and plans of any wider development surrounding the school and the position of the school within it. Details of links to any Travel Plans for that wider development;
- iv. Plans of public transport links; and
- v. Commitment to transfer to the Modeshift STARS on-line travel

plan system for the lifetime of the school.

In summary, at present, only high-level information has been submitted with respect to Travel Planning matters. At this stage, the level of detail is acceptable, although the Highway Authority recommend the inclusion of planning conditions requiring prior to first occupation, the submission of an updated Framework Travel Plan and Full Travel Plans for each constituent land-use. The requirement for these Travel Plans is an essential part of ensuring compliance with the provisions of the LTP4 Policy 3 and Local Plan Policy TRA1.

Contributions

The Dacorum Borough Council website notes the following:

"The Community Infrastructure Levy (CIL) is a way of collecting contributions from developers towards the provision of infrastructure required to support growth in Dacorum. CIL is a non-negotiable planning charge introduced by the government under the Planning Act 2008 to provide local authorities with a more flexible and transparent means of funding infrastructure projects across their local area. The levy is charged per square metre of new development (floorspace) and the charge may vary according to the size, location and type of development."

"As the charging and collecting authority for Dacorum, we are responsible for setting the CIL charge, collecting CIL money and allocating money for infrastructure projects."

"The CIL charge was introduced by Dacorum Borough Council on 1 July 2015 and is applicable to developments that received planning permission on or after 1 July 2015."

HCC's Guide to Developer Infrastructure Contributions (2021) implements a two-strand approach to planning obligations in order to address the immediate impacts of the new development (first strand), and the cumulative impacts of all development on non-car networks (second strand), the second strand usually covered if LPA has adopted CIL.

The Highway Authority uses the toolkit in conjunction with the three CIL tests, noted below:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development; and
- iii. fairly and reasonably related in scale and kind to the development.

The Highway Authority will seek, wherever possible, to secure highway works via planning Condition and s278 agreement. The HCC Guide to Developer Infrastructure Contributions used by the Highway Authority may be accessed via the below link:

Guide to Developer Contributions (hertfordshire.gov.uk)

<https://www.hertfordshire.gov.uk/about-the-council/freedom-of-information-and-council-data/open-data-statistics-about-hertfordshire/who-we-are-and-what-we-do/property/planning-obligations-guidance.aspx#developercontributions>

The below is set out for illustrative purposes only and as a basis for further discussion.

First strand (works to be undertaken under s278):

All access works and off-site mitigation
First strand (to be undertaken using S106)
Bus Service Improvements/New Service

Travel Plan

Approved Travel Plan(s), with individual monitoring fees (and contributions for remedial actions should targets be missed), in accordance with the current HCC Travel Plan guidance, as linked below:

<https://www.hertfordshire.gov.uk/media-library/documents/highways/development-management/travel-plan-guidance.pdf>

The above guidance was published in March 2020 and includes fees for evaluation and support of both residential and workplace Travel Plans and also School Travel Plans.

It is noted that individual Travel Plans will be required for each land-use which is of sufficient size to require the preparation of such a plan.

For residential and workplace Travel Plans, the Evaluation and Supporting Fee is £6,000 (per use) or £1,200 p.a. over five years and for School Travel Plans, £1,500 p.a. over five years. Detailed information regarding these costs is provided in the aforementioned HCC guidance document.

Bus vouchers

Typical monthly bus ticket - £70 per month x 3 = £210

£210 x 1400 = £294,000

Voucher printing cost @ £1 per booklet (each booklet is the value of £70 - 3 booklets per household)

3 x 1400 = £4,200

Reimbursement process/design time: £4,000

Travel Awareness campaigns/PT information: £10,000

Total £312,200

Second Strand (s106):

The Highway Authority wish to note the new Hertfordshire County Council Guide to Developer Infrastructure Contributions, issued 2021

This document replaces the HCC Hertfordshire County Council Planning Obligations Guidance - toolkit for Hertfordshire, published in January 2008.

Summary

The Highway Authority has concerns relating to the deliverability of all accesses.

Our assessment has also raised concerns with the level of infrastructure required to truly integrate the proposal to encourage access by sustainable modes, in particular to/from Tring town centre, Tring railway station and further afield via bus travel.

Therefore, the Highway Authority recommends refusal of the planning application.

FURTHER COMMENTS RECEIVED 23.09.22

COMMENTS:

The applicant seeks planning permission for the following development:

Hybrid application (with access details of two main access points from Bulbourne Road and Station road in full and the main development on

the rest of the site in outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 use class C2 dwellings); a new local centre and sports /community hub, primary school, secondary school, and public open spaces including creation of a suitable alternative natural green space

Introduction

The Highway Authority note the submission of the above major planning application, located on the eastern edge of Tring.

The Highway Authority has reviewed all the technical work relating to highways and transportation, including the Transport Assessment (TA).

The applicant's transport consultant has engaged the Highway Authority in pre-application advice concerning highways and transportation matters, including the scope of the assessment work. The technical work also involved a comprehensive modelling exercise using the Highway Authority's strategic transport model, COMET. The model was run by Hertfordshire County Council's term consultant on behalf of the developer with the results issued back to the transport consultant for further assessment and review work.

The Highway Authority has continued this engagement post application, including the review of a Transport Assessment Addendum (TAA) which contained the results of the strategic modelling exercise. The TAA was issued June 2022.

The Highway Authority note also the issue of Technical Note 14 dated August 2022 which set out the transport consultant's response to the planning application response issued to the Local Planning Authority. The Highway Authority also conducted a technical meeting with the applicant's transport consultant on 31 August 2022 which discussed the formal planning response on highways and transportation matters. The applicant's transport consultant sought to resolve the concerns raised in the Highway Authority's response. The outcome of this meeting was the issue of Technical Note 15 dated 16 September 2022.

This response reflects the post application discussions with the applicant's transport consultant and follows on from the Highway Authority's first formal submission to Dacorum Borough Council which this response should be read in conjunction with.

Sustainability Overview

Chapter 3 of the Transport Assessment (TA) sets out the accessibility of the site to public transport facilities. As noted within the TA, bus stops are available on Station Road and Bulbourne Road, although given the scale of the development site, are located well outside of a 400m walking distance.

Tring railway station is quoted as being approximately 600m from the southern corner of the site, although when measured from the site centre is approximately 1.7km away.

The site's position on the outskirts of Tring, combined with its significant scale, makes the provision of excellent public transport within the site essential. Efficient pedestrian, and cycle links compatible with LTN 1/20 standards to/from Tring railway station are also of key importance.

In terms of access to local facilities and amenities, Chapter 4 details those closest to the site. As noted in Table 4.1, Tring High Street/Tring Town Centre and stated to be 1.6km/1.8km away from the site respectively. Some other facilities, notably education may be accessed within 0.68km to 1.5km away as set out in the table.

As set out above, the site is relatively isolated given its scale and its position on the outskirts of Tring. This is illustrated clearly in the distance to key local facilities and amenities, a majority near the cusp normal acceptable distances. Whilst with a development of this scale, it is noted that some facilities and amenities are proposed in accordance with the development mix, ease of accessibility to Tring via active modes and public transport will be of highest priority. The Highway Authority therefore seeks in accordance with LTP4 Policy 1 measures that can ensure residents have highest quality infrastructure to encourage greater use of non-car modes.

The Highway Authority note the post application responses provided by the transport consultant in response to concerns regarding sustainability. With the additional measures as offered post application and the satisfactory resolution of key issues such as the provision of a high quality bus service, the Highway Authority is content to accept that the applicant has provided a package of works/commitments that can be considered to be compliant with LTP4.

Should planning permission be granted, the Highway Authority will seek to continue to engage with the applicant at the reserved matters stage to ensure that walking and cycling links within the site itself are of a high quality, permeable to the adjoining network and consistent

with LTN 1/20 and offer a viable alternative to the use of the private car.

Public Transport

Bus

Chapter 11 of the TA details a possible standalone bus service. The Highway Authority considers it essential that a bus is provided to a site of this scale, especially given the position of the development relative to key destinations.

It is accepted that discussions on the precise form of the bus service can continue through the planning application process given that the principle and necessity of a dedicated service is accepted by all parties.

Figure 11.2 reproduced below provides an illustration of a possible bus service. The Highway Authority is content to agree that a standalone route is the most suitable option.

The Highway Authority note the submission of the Bus Service Strategy Technical Note, as contained within Appendix N of the TA. The bus strategy has been reviewed by the Highway Authority's Passenger Transport Unit officers and detailed comments have been supplied on the applicant's proposed approach.

The Highway Authority's view is that a high quality and frequent bus service serving both Tring town centre and Tring railway station is an essential component of making the development sustainable and acceptable in planning terms.

Whilst it may be argued that an appropriate location has been chosen for this major development, the site's size and position in a currently semi-rural area means that a suitable bus service is essential alongside high quality walking and cycling routes.

The provision of a standalone, new bus route is therefore essential. The following matters have been discussed post application.

Tring Station

The Highway Authority has raised a concern regarding the deliverability of a bus stop and loop to facilitate a bus service at Tring railway station. Ensuring that residents of the development can travel sustainably to Tring railway station is a key component of the transport package.

Clearly, the train forecourt improvements are a key part of the overall sustainability picture the applicant has promoted, The Highway Authority notes that clarity must be provided on the commitment and incentive for a train operating company to design, commission and deliver all works to align with the development triggers.

To this end, it is understood from the Local Planning Authority that discussions between the applicant and WM Trains have taken place and there appears to be a high level agreement that this is something that should be provided. However, there are still discussions ongoing regarding the level of contributions and the necessary works to facilitate the bus service.

Whilst the Highway Authority recognises that discussions are ongoing, a letter of agreement in principle to the works would be the minimum required at this stage.

The Highway Authority's recommendation is that the improvements to Tring railway station are secured by planning condition or planning obligation.

Planning Conditions

Bus Service – Outline

No more than [TBA] residential units [TBA] shall be occupied until the Bus Service for the Site has been brought into operation in accordance with the Bus Service Strategy. The bus service shall remain in place for at least one year following completion of the development.

The Owner shall not carry out the residential development otherwise than in accordance with the approved Bus Service strategy (including any amendments that are approved by the Council).

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

Public Transport Infrastructure – Outline

Prior to the first occupation of each Parcel of the development, details of the public transport infrastructure shall be submitted to and approved in writing by the Local Planning Authority. This infrastructure shall comprise of but is not limited to the following:

- o Details of bus stop facilities to include raised height kerbs and shelters and real-time information signs, where agreed;
- o Bus priority measures where appropriate within the Central Spine Road;
- o Details of any necessary bus-only Section and bus gate operation; and
- o A programme for the delivery of the public transport infrastructure.

The public transport infrastructure required to serve a particular Parcel, as approved by the Local Planning Authority, shall be implemented in accordance with the approved programme for delivery for that Parcel.

The future locations of all bus stops serving a Parcel should be determined prior to the occupation of any buildings within that Parcel and be clearly marked on site during construction of the internal roads to ensure visibility for prospective purchasers and users.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

Bus provision at Tring Railway Station (or planning obligation)
Prior to first occupation, a scheme for the improvement of Tring Railway Station Forecourt as illustrated on drawing number 332110605_5500_039 Rev P02 shall be constructed to the satisfaction of the Local Planning Authority, in consultation with the Highway Authority.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

Walking and Cycling

The Highway Authority note the transportation strategy with respect to walking and cycling trips as set out within Chapter 11 of the TA. The improvements which seek to connect the site with key local facilities and amenities are welcomed. It is noted that the applicant will seek to contribute to selected schemes identified within the Tring and Berkhamsted Sustainable Transport Study. The transport consultant refers to Appendix M of the TA where a table of selected schemes and level of contributions are set out. The Highway Authority will seek that these schemes and contributions (to be

agreed) are included within the Section 106 or Section 278 agreements.

As discussed within the post application meeting, an additional scheme is proposed.

"HCC and Stantec both identified that the preferred pedestrian road from Marshcroft Lane to the town centre would be via Chiltern Way. At present there is no crossing of Grove Road between Marshcroft Lane and Chiltern Way."

"As noted above, Harrow are content to provide an uncontrolled crossing in this location, funded entirely by the development via an S278 agreement."

A drawing to this effect will be required to be submitted to the Highway Authority and delivered via planning condition and S278 agreement. The Highway Authority welcomes the enhancement of pedestrian facilities outside of the site on a route which would use Marshcroft as the latter is the most direct and likely route to the town centre. The Highway Authority welcomes the additional measures as set out within TN 15 which enhances the site's overall sustainable transport offer.

The Highway Authority has raised a point with respect to the provision of a footway along Bulbourne Road. Although a 3m footway may not in parts be achievable, the Highway Authority will require a continuous footway that ties into the existing provision west of the site on Bulbourne Road. With respect to drawing number 332110605/5500/003F which illustrates the Bulbourne Road access, as part of any Section 278 agreement the extension of the footway to tie into the existing network will be required.

Similarly, for the proposed Station Road access, as part of the Section 278 agreement, full details of the tie in the proposed footway/cycleway within the site curtilage to Station Road will be required. All cycle routes will need to be delivered to a LTN 1/20 standard.

The Highway Authority note the full list of schemes to be delivered by either S106 and S278 agreement as contained within Technical Note 15. All S278 schemes should be subject to planning conditions.

Access

The Highway Authority note the submission of drawings illustrating the site access points. The previous response made reference to design points which can be dealt with as part of the Section 278 agreement.

Drawing number 332110605/5500/011/D illustrates the proposed signalised junction from Station Road.

It is noted that to facilitate this access point, the applicant is seeking a reduction in the speed limit from 60 m.ph. to 40 m.ph.

The Highway Authority notes that such a proposal will need to comply with HCC's Speed Management Strategy, which includes the fundamental requirement of speed limits to be self-enforcing, largely influenced by environment. Through the pre-application process, the Highway Authority notes that in order to achieve a reduction in speed on Station Road, substantial changes would be necessary in order to alter the road's rural character.

Subsequent to the submission of the application, the Highway Authority has taken the proposed speed reduction scheme to HCC's Speed Management Group, which comprises senior highways officers and a police representative. Further to consideration of the proposed access design, the environment on Station Road (existing and proposed), the group is of the view that the speed limit should not be reduced to below 50 m.p.h.

As such, the Highway Authority will require adjustments to the submitted design in order to comply with highway design guidance. The Highway Authority has commented in our previous response regarding the proposals for Marshcroft, which is presently public highway and will need amendment to facilitate the development and the internal spine road. Whilst indicative proposals have been set out within the TA (and the Highway Authority was seeking more detail), it is accepted that the detail can be provided at the reserved matters stage. As such, our previous comments may be considered at a later date.

Drawing number 332110605/5500/003/F illustrates the proposed access from Bulbourne Road. The drawing illustrates a ghost island right turn priority controlled T junction. As with the Station Road access, the Highway Authority has made some technical points relating to highway design which are considered to be resolvable via the S278 agreement and the detailed design process.

Including the access junctions, all off-site highways improvement schemes should be subject to Road Safety Audit.

Off-Site Highways Infrastructure

The following off site mitigation is proposed:

Stantec Drawing 332110605_5500_039 Rev P02 - Tring Station
Concept Improvement Scheme
Stantec Drawing 332110605/5500/012 - London Road / Station Road
Proposed Mitigation Scheme
Stantec Drawing 332110605/5500/013 - Grove Road / Station Road /
Cow Lane Proposed Mitigation Scheme
Stantec Drawing 332110605/5500/014 - Cow Lane / A4251 Proposed
Mitigation Scheme

Post Application Additional Infrastructure Offering

The Highway Authority welcomes the provision of a Puffin crossing as illustrated on drawing number 33210605-5500-041 included in Appendix B of TN 15 which will assist in improving accessibility to the station.

The Highway Authority commented on the potential desire line for residents of the development to cross to the south side of Station Road where a number of leisure facilities may be accessed, including the Court Theatre.

Drawing 33210605-5500-042 included in Appendix D illustrates a proposed uncontrolled crossing. The Highway Authority is content to accept the illustrative layout. This will be delivered via planning condition and S278.

To facilitate the above works, the applicant should enter into a Section 278 agreement with the Highway Authority.

Highways Planning Conditions

New Access(es)/Approved Drawings

Prior to the commencement of the development hereby permitted, the vehicular and/or pedestrian and cyclist accesses shall be provided and thereafter retained at the position shown on the approved plan drawing number(s) 332110605/5500/003 Rev F and 332110605/5500/011 Rev D.

Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway carriageway.

Reason: To ensure satisfactory access into the site and avoid carriage of extraneous material or surface water from or onto the highway in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

Highway Improvements - Offsite (Design Approval) Part A - Outline
Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the offsite highway improvement works as indicated on drawing(s) numbers 332110605_5500_039 Rev P02, 332110605/5500/012, 332110605/5500/013, 332110605/5500/014, 33210605-5500-041 and 33210605-5500-042 (and all S278 schemes identified within Technical Note 15), have been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

Highway Improvements - Offsite (Implementation / Construction) Part B – Outline

Prior to the first occupation /use of the development hereby permitted the offsite highway improvement works referred to in Part A of this condition shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

Speed Limit - Outline

Prior to commencement of development, a scheme for the reduction in the speed limit (to 50 m.ph.) on the specified section of Station Road shall be submitted to the Local Planning Authority in consultation with the Highway Authority. Prior to first occupation, the scheme shall be implemented.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

TRO for prohibition of vehicles on a specific section

No development shall commence until such time as an order to remove vehicular access rights over the land as shown on Figure 5.2 of the TA on Marshcroft Lane has been granted and all Highway rights

over the specified section of Marshcroft Lane land have been successfully removed.

Reason: To ensure construction of a satisfactory development and in accordance with Policy 12 of Hertfordshire's Local Transport Plan (adopted 2018).

Visibility Splays

Prior to the first occupation of the development hereby permitted, visibility splays shall be provided in full accordance with the details indicated on the approved drawing number(s) 332110605/5500/003 Rev F and 332110605/5500/011 Rev D. The splays shall thereafter be maintained at all times free from any obstruction between 600mm and 2m above the level of the adjacent highway carriageway.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

Assessment

The Highway Authority note the extensive modelling exercise conducted for the development as detailed within our previous response. Given that the Highway Authority is content that the development may be accommodated on the local highway network with the proposed mitigation, no further comment is made here.

Travel Plan

As this development is a large mixed-use development with multiple occupants, an overarching Framework Travel Plan will be required. The applicant has submitted a Framework Residential Travel Plan. At this outline stage, the Framework Travel Plan is acceptable, although prior to first occupation, should be updated (in consultation with Hertfordshire's Travel Plan team), to accord with our guidance.

In conjunction with the above Framework Travel Plan, the Highway Authority will require Full Travel Plans, including an updated Residential Travel Plan to be submitted for each constituent part of the development (where it meets the thresholds for either a Travel Plan or Travel Plan Statement).

School Travel Plan

These are Travel plans that are created for schools are for nursery, primary, middle, secondary and independent schools. The primary

school will require its own School Travel Plan. School Travel Plans are subject to a separate charging schedule.

Planning Conditions

Travel Plan – Outline

No part of the development hereby permitted shall be occupied prior to the approval of the Overarching Travel Plan and the approval of the relevant Plot Travel Plans and the implementation of those parts identified in the approved Overarching Travel Plan as capable of being implemented prior to occupation. Those parts of the approved Overall Travel Plan and the Plot Travel Plans implemented in accordance with the timetable contained therein shall continue to be implemented as long as any part of the development is occupied.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

School Travel Plan – Outline

Within three months of the first use of a school opening, a Modeshift STARS School Travel Plan should be prepared and submitted to Hertfordshire County Council, and fully approved by the School Travel Plan Team (the team can be contacted at: activeandsafertravel@hertfordshire.gov.uk). Thereafter the Travel Plan shall be implemented in full throughout the life of the school.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

Monitoring – Outline

Prior to commencement of any development the submission and agreement of a mechanism of continual review of the transport impacts of the development to include (but not be restricted to) the installation of traffic counters upon each access, travel plan monitoring and regular dialogue between Developer, Local Planning Authority and Highway Authority. The findings of this work shall be shared between all interested parties with a view to remedying any problems arising directly from the construction or occupation of the development.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

Reserved Matters – Outline

The Highway Authority note that this is a hybrid application and that the detailed internal layout (and all other matters except access), will be subject to a reserved matters application. The following planning conditions set out what information should be provided with such an application.

Details of Reserved Matters - Outline

For the area of development for which Outline permission is granted (as outlined in Drawing Number: HRE003-025 Rev C), no development, apart from enabling works and earthworks, shall commence until detailed plans for that Parcel have been submitted to and approved in writing by the Local Planning Authority. These plans will show the access, layout, scale, design, internal layout, and external appearance of the buildings to be constructed and landscaping to be implemented (hereinafter referred to as "the Reserved Matters") on that Plot. The development shall only be carried out as approved.

Reason: To comply with the requirements of section 92(4) of the Town and Country planning Act 1990 and the provisions of the Town and Country Planning (Development Management Procedure) Order 2015 and to ensure that high standards of urban design and a comprehensively planned development are achieved. To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

Detailed Highways Plans – Outline

Prior to the commencement of the development, full details in relation to the design of estate roads (in the form of scaled plans and / or written specifications for each phase) shall be submitted to and approved in writing by the Local Planning Authority to detail the following:

- a. Roads;
- b. Footways
- c. Cycleways (compliant with LTN 1/20);
- d. External public lighting;
- e. Minor artefacts, structures and functional services;

- f. Foul and surface water drainage;
- g. Visibility splays;
- h. Access arrangements including temporary construction access
- i. Hard surfacing materials;
- j. Parking areas for vehicles and cycles;
- k. Loading areas; and
- l. Turning and circulation areas.

The development shall be implemented in accordance with those approved plans.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan 2018.

Maintenance of Streets – Outline

Prior to the occupation of any dwellings within any Parcel of the development, full details shall be submitted to and approved in writing by the Local Planning Authority in relation to the proposed arrangements for future management and maintenance of the proposed streets within that Parcel. Following the provision of such streets, the streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an agreement has been entered into under Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established in accordance with the approved details.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan 2018.

Construction

The site will need the preparation of a comprehensive Construction Traffic Management Plan.

Planning Condition

Prior to the commencement of the development for which full planning permission is granted, a detailed Construction Traffic Management Plan relating shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the construction of the development for which full planning permission has been granted shall only be carried out in accordance with the approved CTMP unless otherwise agreed in writing by the local planning authority. The plan

shall be prepared in accordance with the Construction Logistics and Community Safety (CLOCS) Standard.

Pursuant to the above, prior to the commencement of any Parcel/Phase or Sub-Phase, a detailed Construction Traffic Management Plan (CTMP) for that Parcel/Phase or Sub-Phase, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the construction of any Parcel/Phase or Sub-Phase shall only be carried out in accordance with the approved CTMP for that Parcel/Phase or Sub-Phase unless otherwise agreed in writing by the local planning authority.

The plan shall include the following:

- i. The construction programme;
- ii. Clear access strategy for construction vehicles that avoids conflicts with pedestrians, cyclists, public transport and existing and future residents;
- iii. Hours of operation;
- iv. Phasing of the development of the site, including all highway works;
- v. Construction vehicle numbers, type, routing;
- vi. Traffic management requirements;
- vii. Cleaning of site entrances, site tracks and the adjacent public highway;
- viii. Provision of sufficient on-site parking prior to commencement of construction activities;
- ix. Details of any highway works necessary to enable construction to take place, including temporary access works;
- x. Details of any works to or affecting Public Rights of Way within and in the vicinity of the site. These shall demonstrate how safe and unobstructed access will be maintained at all times or be temporarily closed or extinguished.
- xi. Details of servicing and delivery, including details of site access, compound, welfare facilities, hoarding, construction related parking, loading, unloading, turning areas and materials storage areas;
- xii. Where works cannot be wholly contained within the site, a plan should be submitted showing the site layout on the highway, including extent of hoarding, pedestrian routes and remaining road width for vehicle movements and proposed traffic management;
- xiii. Management of construction traffic and deliveries to reduce congestion and avoid school pick up/drop off times, including numbers, type and routing;
- xiv. Control of dust and dirt on the public highway, including details of wheel washing facilities and cleaning of site entrance adjacent to the public highway;

- xv. Details of public contact arrangements and complaint management;
- xvi. Construction waste management proposals;
- xvii. Mechanisms to deal with environmental impacts such as noise and vibration, air quality and dust, light and odour;
- xviii. Post construction restoration/reinstatement of the working areas and temporary access to the public highway; and
- xix. Measures to be implemented to ensure wayfinding for both occupiers of the site and or those travelling through it.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

Phasing

Planning Condition

Phasing Plan – Outline

Notwithstanding the information contained in the Transport Assessment, no development shall Commence in respect of any Development Parcel or Strategic Engineering Element until a Site Wide Phasing Plan, which accords with agreed Section 106 triggers has be submitted to the local planning authority for approval. The Phasing Plan shall include the sequence of providing the following elements:

- a) Development parcels;
- b) Major distributor roads/routes within the site, including timing of provision and opening of access points into the site;
- c) The local centre, or for example, mobility hubs, convenience store and community facilities
- d) Strategic foul surface water features and SUDS;
- e) Open space, allotments and orchard;
- f) Strategic electricity and telecommunications networks;
- g) Environmental mitigation measures.

No development shall commence apart from enabling works and strategic engineering elements, unless, agreed in writing by the Local Planning Authority until such time as the phasing plan has been approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved phasing contained within the phasing plan unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure suitable, safe and satisfactory planning and

development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan 2018.

Contributions

The Dacorum Borough Council website notes the following:

"The Community Infrastructure Levy (CIL) is a way of collecting contributions from developers towards the provision of infrastructure required to support growth in Dacorum. CIL is a non-negotiable planning charge introduced by the government under the Planning Act 2008 to provide local authorities with a more flexible and transparent means of funding infrastructure projects across their local area. The levy is charged per square metre of new development (floorspace) and the charge may vary according to the size, location and type of development."

"As the charging and collecting authority for Dacorum, we are responsible for setting the CIL charge, collecting CIL money and allocating money for infrastructure projects."

"The CIL charge was introduced by Dacorum Borough Council on 1 July 2015 and is applicable to developments that received planning permission on or after 1 July 2015."

HCC's Guide to Developer Infrastructure Contributions (2021) implements a two-strand approach to planning obligations in order to address the immediate impacts of the new development (first strand), and the cumulative impacts of all development on non-car networks (second strand), the second strand usually covered if LPA has adopted CIL.

The Highway Authority uses the toolkit in conjunction with the three CIL tests, noted below:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development; and
- iii. fairly and reasonably related in scale and kind to the development.

The Highway Authority will seek, wherever possible, to secure highway works via planning Condition and s278 agreement. The HCC Guide to Developer Infrastructure Contributions used by the Highway Authority may be accessed via the below link:

Guide to Developer Contributions ([hertfordshire.gov.uk](https://www.hertfordshire.gov.uk))

<https://www.hertfordshire.gov.uk/about-the-council/freedom-of-information-and-council-data/open-data-statistics-about->

[hertfordshire/who-we-are-and-what-we-do/property/planning-obligations-guidance.aspx#developercontributions](https://www.hertfordshire.gov.uk/who-we-are-and-what-we-do/property/planning-obligations-guidance.aspx#developercontributions)

The below is set out for illustrative purposes only and as a basis for further discussion.

First strand (works to be undertaken under s278):

All access works (to/from the site) and off-site mitigation as identified below:

First strand (to be undertaken using S106)

All schemes as identified below:

Travel Plan

Approved Travel Plan(s), with individual monitoring fees (and contributions for remedial actions should targets be missed), in accordance with the current HCC Travel Plan guidance, as linked below:

<https://www.hertfordshire.gov.uk/media-library/documents/highways/development-management/travel-plan-guidance.pdf>

The above guidance was published in March 2020 and includes fees for evaluation and support of both residential and workplace Travel Plans and also School Travel Plans.

It is noted that individual Travel Plans will be required for each land-use which is of sufficient size to require the preparation of such a plan. For residential and workplace Travel Plans, the Evaluation and Supporting Fee is £6,000 (per use) or £1,200 p.a. over five years and for School Travel Plans, £1,500 p.a. over five years. Detailed information regarding these costs is provided in the aforementioned HCC guidance document.

Bus vouchers

The Highway Authority will seek that new residents are provided with bus vouchers for a trial period in order to seek to encourage sustainable travel from the outset.

Typical monthly bus ticket - £70 per month x 3 = £210

£210 x 1400 = £294,000

Voucher printing cost @ £1 per booklet (each booklet is the value of £70 – 3 booklets per household)

3 x 1400 = £4,200

Reimbursement process/design time: £4,000

Travel Awareness campaigns/PT information: £10,000
Total £312,200

Second Strand (s106):

The Highway Authority wish to note the new Hertfordshire County Council Guide to Developer Infrastructure Contributions, issued 2021 This document replaces the HCC Hertfordshire County Council Planning Obligations Guidance – toolkit for Hertfordshire, published in January 2008.

The document sets out that a contribution of £6,826 per dwelling is required as a headline figure. This can then be applied to the total number of dwellings proposed. Separate contributions may also be sought for the commercial elements of the site on a per job basis. Should there be funds remaining (when taking into account the Strand 1 works), from the calculation of a headline contribution (£6,826 x 1,400) the Highway Authority may seek a contribution to schemes listed in the Growth and Transport Plan for the area or schemes that accord with the CIL test.

Summary

The Highway Authority has reviewed all highways and transportation matters relating to the planning application.

As detailed previously, the technical assessment methodology is acceptable, although the Highway Authority sought clarifications with respect to the sustainability of the site. Through the submission of Technical Notes 14 and 15, the Highway Authority is content that via Section 106 and 278 agreements that a package of measures that can ensure the development is acceptable in planning terms is achievable. The proposed access strategy is acceptable and the Highway Authority consider that through detailed design and Road Safety Audit that the junctions may be satisfactorily implemented.

The Highway Authority does however note that further work will be necessary with respect to the bus strategy and Tring Station forecourt improvements, although is content to accept that appropriate planning conditions can be agreed.

In summary, the Highway Authority does not wish to restrict the grant of planning permission subject to the planning conditions and advisory notes as set out within this response.

HIGHWAY INFORMATIVES:

HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980.

AN1) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence. Further information is available via the website:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN2) Obstruction of public highway land: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the website: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN3) Road Deposits: It is an offence under section 148 of the Highways Act 1980 to deposit mud or other debris on the public highway, and section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available via the website:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN4) S106 Agreement. A Section 106 agreement will be required for the following:

Approved Travel Plan(s), with individual monitoring fees (and contributions for remedial actions should targets be missed), in accordance with the current HCC Travel plan guidance document for business, residential and education development (March 2020). Individual Travel Plans will be required for each land-use which is of

	<p>sufficient size to require the preparation of such a plan. Monitoring costs are set out below in accordance with HCC guidance:</p> <ol style="list-style-type: none"> I. £6k monitoring fee for residential and workplace uses, £1,2k p.a. (five years' of monitoring); II. £10.5k monitoring fee for a School Travel Plan, £1.5k p.a. (seven years' of monitoring); III. New bus service and bus vouchers; and IV. Infrastructure schemes as identified within this response. <p>Summary</p> <p>The above contributions will come under the auspices of 'Guide to Developer Infrastructure Contributions' which was approved in July 2021.</p> <p>As part of the revised planning obligation toolkit, a theoretical contribution of up to £6,826 per dwelling has been calculated as the figure necessary to deliver supporting infrastructure across the County. All relevant schemes in the local area will also need to accord with the three CIL tests.</p> <p>AN5) Construction standards for works within the highway: The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Sections 38 and 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website: https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx</p>
<p>Chilterns Conservation Board</p>	<p>Land East of Tring - CCB Holding Direction (SAC) Comments (AONB setting)</p> <p>Thank you for consulting the Chilterns Conservation Board (CCB). This application is largely enveloped by the AONB to the northeast, south and southwestern boundaries.</p> <p>SUMMARY POINTS</p> <p>Chilterns Beechwoods SAC (Holding Objection)</p>

In our judgment this application requires a strategic assessment of policy. The Local Plan process is the best means, by far, in which to resolve issues of housing need and environmental protection. The Local Plan is paused but not withdrawn and the recent Natural England (14th March 2022) pronouncement on the Chilterns Beechwood SAC is a matter of great importance. We conclude, ultimately, that the long-term protection of the SAC requires an appropriate mitigation strategy to be delivered via the Local Plan process. To attempt such mitigation at application only level must be considered an incremental approach. This cannot be sustainable when applying the appropriate assessment methodology in the Habitat Regulations because it prevents a holistic and cumulative assessment of all sites in preference to a case by case (incremental) approach.

The CCB in delivering its duties as established by the CROW Act section 87 promotes the need for a strategic solution to the protection of the SAC, which the planning authority themselves have been striving to deliver over the last 18 months or so. The 'bespoke mitigation strategy' as promoted by Harrow Estates / Redrow Homes is backed up by a SANGs statement (document 28) and a Habitats Regulation Assessment (HRA) (document 31). 26.88 ha of SANGs (total site area 121 ha) is proposed, in phased delivery and discussions have been held with various parties, including Natural England, albeit they are yet to respond on this application. The key problem is that such an approach is not sustainable for the whole District. The HRA regulations sets the test as a 'significant effect' (either direct or indirect) and this requires cumulative assessment of impact. In our view the LPA would struggle to reach a robust conclusion on such a matter by applying the SANGs methodology in this manner, i.e., on a site-by-site and piecemeal basis.

We raise a holding objection here because the proposed 'bespoke solution' cannot be the way forward for the long-term planning of the District. The NPPF stipulates at its paragraph 15 that, 'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings'.

The supporting planning statement at 19.3 states that, 'the impact of growth on the Chilterns Beechwoods SAC has been effectively mitigated'. We content that such a bold statement is impossible to prove either way because what is proposed here is, by definition, a piecemeal approach. Looking at the 14th March 2022 Natural England publication on the SAC we cannot envisage that this approach aligns itself correctly with the new mitigation strategy that they are now

promoting.

AONB Setting (comments)

The setting of the AONB is a matter of material importance, with the AONB wrapping around the site, to a large extent. A ZVI plan (figure 8.6) shows the nature of intervisibility, and this is required to influence appropriate mitigation. Sensitivity to nighttime light sources (also see figure 8.7) is relevant, to avoid lighting glare and spill into the AONB. Reference to the ILP Environment Zone E1 'natural' and thus the AONB, notes the high sensitivity of this receiving landscape.

The setting of the AONB is a matter relevant to legislation (see CROW Act section 85 for matters, 'so as to affect' the AONB), Development Plan policy (Core Strategy CS24) and in the NPPF (paragraph 176 as revised to include AONB setting in July 2022). The CCB has also produced a position statement on setting and this states (its paragraph 14) that, 'The setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may have an impact even if some considerable distance from the AONB boundary. However, the distance away from the AONB will be a material factor in forming a decision on any proposals, in that the further away a development is from the AONB boundary the more the impact is likely to be reduced'. Examples can include,:

- o Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way;
- o Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB;
- o Breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and/or movement (viaducts, chimneys, plumes or rotors for example);
- o The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways;
- o Loss of tranquillity through the introduction of lighting, noise, or traffic movement;
- o Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB;
- o Change of use of land that is of sufficient scale to cause harm to landscape character;
- o Loss of biodiversity, particularly in connection with those habitats or species of importance in the AONB;
- o Loss of features of historic interest, particularly if these are contiguous with the AONB;
- o Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes.

The AONB Management Plan 2019-2024 also contains a policy on setting as DP4 'In the setting of the AONB, take full account of whether proposals harm the AONB. For example, development of land

visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or which increases water abstraction from the chalk aquifer, thereby reducing flow in chalk streams'.

DETAILED POINTS (linked to our comments at the Local Plan consultation stage, Summer 2021).

GB Land as essential Buffer to the AONB and including the SAC.

CCB made the point at the Local Plan stage that the Green Belt acts as a buffer for the AONB and provides a means of managing development within in its setting. Nowhere are the shortcomings in this respect of the draft local plan clearer than in the justification (insofar as it is made in the plan itself) for the release of land from the Green Belt. This is of importance to the CCB because the Green Belt, especially around Tring, Berkhamsted and the north of Hemel Hempstead, fulfils part of its defined purpose of "safeguarding the countryside from encroachment" by providing a permanent and substantial open buffer between built-up areas and the designated AONB, as well as sensitive habitats such as the Chilterns Beechwoods SAC. The Green Belt here also serves as a key means of managing the setting of the AONB as part of protecting its natural beauty and providing space within which that beauty may be enhanced through landscape restoration. Releasing land from the Green Belt in these locations requires rigorous justification, and the "exceptional circumstances" demonstrated surely must, explicitly, take account of issues regarding the setting of the AONB, as well as impacts arising from those developments on the AONB itself, such as visitor management, air quality and light pollution. It is not evident from either the local plan or the "Green Belt and Rural Area" topic paper that this matter has been considered properly by the council. The supporting text to the Green Belt policy (SP11) at paragraph 19.6 of the draft local plan refers the reader to the "Sustainable Development Strategy" section for the demonstration that "exceptional circumstances" apply to release land from the Green Belt. That section runs to some 28 pages and contains no obvious rationale for Green Belt release.

As applies to this application. The application papers argue very special circumstances for green belt release. This is a matter for the Local Plan process, which allows a valuable opportunity to consider the relationship between AONB protection and setting, including the contribution made by the green belt to that setting.

Transformation / Regeneration of Hemel Hempstead

The main justification for "exceptional circumstances" to release any land from the Green Belt in the local plan appears to be that there is a need for development that cannot be met elsewhere (either within the Borough or in a neighbouring authority). It may be inferred from reading this section (and the topic paper) that the over-riding issue, beyond estimates of need and aspirations for growth (which should, under NPPF para 11(b), be outweighed by the policies that provide a "strong reason" for development restraint), is the sustainable "transformation and regeneration of Hemel Hempstead and renewal of its New Town infrastructure" (para 5.3 of the Local Plan). This is a laudable objective but is hard to see how this necessarily justifies significant releases of Green Belt at Tring or Berkhamsted. This objective may justify the release of Green Belt land around Hemel Hempstead, but not necessarily to determine that the main focus for development should be in the setting of the AONB: preferable alternatives are available.

As applies to this application. Again, and as above the Local Plan process permits an appropriate opportunity for review.

Policy DM31 on the Chiltern Beechwoods SAC

CCB raised an objection to this policy. This was set against an expression of thanks for the engagement undertaken by DBC on the policies and proposals supporting the protection and enhancement of the Chiltern Beechwood SAC sites at Ashridge and Tring Park. Whilst we expressed support for the principle and objectives behind this policy, our objection to this policy raised the point that the focus in much of the plan, including policy DM31, is on mitigating or compensating for the impacts of these developments on the SAC, rather than avoiding the harm arising in the first place.

This policy continues to focus on mitigation (with avoidance of harm only considered in terms of the development taking place) and this framework is not considered to provide sufficient protection for the SAC in terms of setting out what evidence is required to justify the assumption that there is need for development sufficient to over-ride the general presumption against causing harm to these sites. There is not even the application of the precautionary principle.

Natural England's subsequent publication on 14th March 2022 regarding the Chilterns Beechwoods SAC takes this point further and adds authority and weight to the need for a strategic approach to any mitigation strategy.

New Natural England advice on Chilterns Beechwoods SAC

The creation on 14 March 2022 of Natural England's Zone of influence (ZOI) of 12.6km around the Chiltern Beechwoods SAC now means that a reappraisal of mitigation is necessary for new residential development, as well as for the Tring Woodlands SSSI. Whilst it may be anticipated that such mitigation will manifest as the creation of SANG's, the development of a strategic approach is necessary amongst the host LPAs and Natural England will require this. The need for this necessary strategic direction and approach makes it 'premature' to determine applications as now proposed for the east of Tring.

Dacorum issued an update on this (via their website) and stated (selected excerpts) that, 'more action is needed to help protect Ashridge Estate on the Hertfordshire-Buckinghamshire border, and Tring Woodlands, which are under increasing visitor pressure from the borough and surrounding areas'. The integrity of the SAC requires a mitigation strategy in fulfilment of the regulatory duties contained in the Habitats Regulations Assessment.

The statement went further to clarify that 'the way we deal with planning applications in the future that involve new homes (and some other types of development) is going to change. Such proposals that are within 500 metres of Ashridge Estate and Tring Woodlands are likely to be refused'.

[it continued]. 'In addition to this, we are legally required not to issue decisions on similar applications elsewhere in the borough until appropriate mitigation is secured. In the interim, this will mean additional checks for affected planning applications and the need for us to put on hold issuing the final decision notice. All other applications will be processed and determined as normal'.

As applies to this application.

This application falls within the spatially defined ZOI. NE's requirement to reinforce an appropriate and long-term mitigation strategy is very timely and will carry weight as a material planning consideration. It gives real force to the argument, itself accepted by DBC, that a strategic approach to mitigation is required.

The Board recommends that the decision-maker takes into account the following:

- o The Chilterns AONB Management Plan (<http://www.chilternsaonb.org/conservation-board/management-plan.html>), which deals with the special qualities of the Chilterns and the development chapter notes that 'the attractiveness of the Chilterns'

	<p>landscape is due to its natural, built and cultural environment. It is not a wilderness but countryside adorned by villages, hamlets and scattered buildings'.</p> <ul style="list-style-type: none"> o The Board is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB <p>The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of CroW Act).</p>
<p>British Pipeline Agency</p>	<p>The proposed works are in close proximity to a high-pressure petroleum pipeline system and BPA wish to ensure that any works in the vicinity of the pipeline are carried out in accordance with our safety requirements (www.linewatch.co.uk). Please find attached a GIS map of our pipeline(s) in relation to the above application.</p> <p>We are pleased that the BPA pipeline appears to have been taken on board in the masterplan, in that most of the housing has been designed away from the pipeline. Where there are some housing areas around the pipeline, the crossings (both vehicular and service) should be limited to as few as possible, and as perpendicular as possible. The pipeline will also need to be excavated, inspected, rewrapped and slabbed at each of these.</p> <p>It must also be noted that there are currently numerous ponds located above the pipeline and easement. There can be no change in ground levels over the pipeline or easement, and consequently when the locations for these are being finalised, these need to be located outside the easement.</p> <p>The most important points are:</p> <ul style="list-style-type: none"> o These Pipelines carry refined petroleum at extremely high pressure. o Any construction must be kept a minimum of 6m from the pipelines. o All excavations (including hand trial holes) within 6m of the pipeline must be approved and supervised by BPA. o The exact location of the pipeline to be marked by BPA in consultation with the developer prior to detailed design. o Nominal cover is only 0.9m (3'). o Normal vertical clearance for new services is 600mm. o These pipelines are protected by cathodic protection and you should consult with BPA if you are laying any services (with or without cathodic protection). o Heavy vehicular crossing points to be approved before use across the easement.

	<ul style="list-style-type: none"> o Tree planting is prohibited within the easement. o No buildings can be located within the pipeline easement. o No lowering or significantly raising of ground level throughout the easement. o A continuous BPA site presence will be required for works within the easement. o Utility crossings may require a formal crossing consent o BPA do not charge for the first three days of supervision (this includes site meetings). After that, BPA will charge for any future supervision. <p>When planning works which involve crossing or working within the easement of the pipeline, the following will be requested before works can start:</p> <ul style="list-style-type: none"> o A confirmed or proposed programmed start date for the works o A detailed description of the proposed works o A plan of the work area, o Drawings and a method statement for the written approval of BPA.
<p>The Chiltern Society</p>	<p>The Chiltern Society is a charitable body with almost 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our supporters are passionate about the protection of the Chilterns, which is a special area of landscape within easy travelling distance of several towns and the City of London. Much of the area is classified as both AONB and Green Belt and should receive extensive protection under the national policies in the National Planning Policy Framework (NPPF).'</p> <p>The Chiltern Society strongly objects to the proposed development due to detrimental impacts on the Green Belt and the setting of the Chilterns AONB. The Society has reviewed the planning application, and the Planning Statement and Landscape and Visual Impact Assessment in particular, and has the following comments -</p> <p>1. House Building is classed as 'inappropriate development' in the Green Belt. The Society opposes development in the Green Belt which fails to protect its openness or undermines its 5 purposes. These are:' to check unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist safeguarding the countryside from encroachment; to preserve the settling and special character of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.'The proposed development would clearly be inappropriate development in the Green Belt and would be by definition harmful. Given the proposed large scale of the development, the impact would</p>

lead to substantial harm, and this would need to be given substantial weight against the development.

2. The land is currently open farmland with very few buildings. The development of 1400 homes would lead to a significant loss of openness in the Green Belt. This would also need to be given substantial weight against the development.

3. The development would be in the immediate setting of the Chilterns AONB to the north, east and south. As well as being detrimental to the AONB in terms of intervisibility, this would also add to the harm to be considered in the planning balance.

4. The proposal would lead to the permanent loss of 121ha of open agricultural land. As well as changing the open character of the land it would make the land unavailable for growing of food. In times of changing farming subsidies, reducing food miles and uncertainties with wheat supply from Ukraine, the loss of this land would be significantly harmful.

5. With nature in decline and significant changes to the climate, now is not the time to be sacrificing large areas of protected open countryside for new development. Government policy on levelling up should be reducing pressure for development in the South East and changes to the planning system are imminent but as yet not set out. This, coupled with the delay in the Local Plan, makes this application premature.

6. A development of this scale would be likely to have a significant harmful impact on the character of the town by increasing the population and the resulting traffic congestion, and losing the direct links between the existing town and the open countryside.

7. The applicant appears to be relying on the draft Local Plan to justify the proposal, and in particular that this was one of the sites considered for a housing allocation. The plan was strongly opposed by the local community and the Council has decided not to proceed with it until further evidence has been gathered and further options considered. This, coupled with the fact that the Plan was at an early stage, mean that the emerging plan should be given little if any weight in determining the application. Decisions should be made based on the adopted Core Strategy and Local Plan. It is therefore an unallocated site in the Green Belt and should be subject to national and local Green Belt policy.

8. We do not agree with the applicant's approach to demonstrating 'very special circumstances' to allow development in the Green Belt. In our view, there needs to be an overwhelming reason why

development here would 'clearly outweigh' the substantial harm to the Green Belt and the setting of the AONB. It is not sufficient to simply set out mitigation measures, which would be expected in any case, and add a little bit more. Whilst additional measures such as more Biodiversity Net Gain, more suitable accessible natural greenspace, new schools and leisure facilities can be considered as gains they cannot be considered 'very special' in order to outweigh the significant and substantial harm to a large area of Green Belt.

9. Neither Borough housing targets nor the lack of a 5-year land supply should be considered as substantive reasons for clearly outweighing harm to the openness and permanence of the Green Belt and demonstrating very special circumstances.

10. We also dispute the applicant's assertion that the site should be considered to be 'very special' because it is very large. In fact, the opposite is the case as the cumulative impact of the development proposed would be very significant and extremely harmful.

11. NPPF Para 11 states -

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Para d) i clearly applies in this case because the areas identified as being of importance are confirmed to include the AONB and Green Belt in footnote 7. The sheer scale of the loss of Green Belt provides a clear reason for refusing the application.

The applicant has also not demonstrated that the development would overcome the requirements of para d) ii as the harm to the Green Belt and the setting of the AONB clearly outweigh the benefits of the scheme.

12. NPPF Para 140 refers to exceptional circumstances in relation to changes in Green Belt. This is not relevant in this case as it relates to changes in Green Belt itself, which can only be changed as part of a Local Plan. In this respect, the land concerned in this application is currently and will remain Green Belt unless reviewed in the new Dacorum Local Plan. Accordingly, the only basis on which this application could be approved is under NPPF 146/7 which requires very special circumstances to be established."

13. We submit however, that this paragraph is not intended to apply to a wholesale redevelopment of this area, the effect of which if approved, would leave no remaining Green Belt protected land and would have the effect therefore of removing this whole area from Green Belt protection whilst still technically remaining Green Belt. 'Indeed, this proposed development is by definition inappropriate as it does not fall under any of the matters listed in NPPF 149 which only potentially accepts the listed exceptions and anything else is inappropriate. 'If NPPF 148 is applied here, then how can this development qualify given that it entails a full override of the benefits of the Green Belt; so how can it qualify as very special circumstances?'

14. A development on this scale within the Green Belt should only be promoted through the development of a new Local Plan and the demonstration of exceptional circumstances for removing land from the Green Belt. In sensitive locations such as Tring the Council should be rigidly applying a plan-led system and not allowing piecemeal applications for substantial developments.'

15. NPPF Para 176 refers to impacts on the setting of the AONB as follows -

176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

There is clear intervisibility between the site and the AONB, so the cumulative effect of the development on the setting of the AONB would be significant.

16. We are aware that the Dacorum Landscape Sensitivity Study that accompanied the Emerging Strategy for Growth consultation assessed the site to have Moderate-High landscape susceptibility to change arising from residential and mixed-use development, and to have an overall Moderate-High landscape sensitivity. Given this assessment, the site is not suitable for this size of development and the application should be resisted. The landscape value of Site TRO3 was assessed as "high representativeness of wider landscape character: views to the Chilterns escarpment, transport corridor including the Grand Union canal, mixed open farmland, urban fringe influences around Tring including a garden centre".

17. In the absence of a new Local Plan, the decision should be taken in accordance with the Core Strategy. Core Strategy 2013 made provision for 480 new homes in Tring, including an allocation at West Tring. Tring was identified as an "Area of Limited Opportunity". In these areas, "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs".

The proposed development clearly conflicts with this policy and should be refused.

18. Policy CS1 Distribution of Development includes, "The rural character of the borough will be conserved. Development that supports the vitality and viability of local communities, causes no damage to the existing character of a village and/or surrounding area and is compatible with policies protecting and enhancing the Green Belt, Rural Area and Chilterns Area of Outstanding Natural Beauty will be supported".

This development would certainly not conserve the rural character of the Borough and would not comply with policies on the Green Belt, Rural Area and AONB.

19. Policy CS5 Green Belt includes, "The Council will apply national Green Belt policy to protect the openness and character of the Green Belt, local distinctiveness, and the physical separation of settlements.

There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted.

Within the Green Belt, small-scale development will be permitted..."

The development would definitely not be small scale and would be contrary to national Green Belt policy as very special circumstances cannot be demonstrated.

20. Policy CS24 Chilterns Area of Outstanding Natural Beauty includes, "The special qualities of the Chilterns Area of Outstanding Natural Beauty will be conserved".

The development would harm the setting of the AONB by impacting on view into and out of the AONB.

21. Tring Place Strategy Vision states "Tring remains a successful compact market town surrounded by farmland and delivering a high quality of life and prosperity for its residents and business community. Its built and natural heritage has been retained and enhanced. Accessibility to services and facilities has been improved, whilst promoting sustainable forms of travel.

This has been achieved by delivering a greater range of high quality housing to suit long-term local needs that integrates with the character of the town. Small-scale business activity is encouraged and advantage taken of tourist attractions, such as the Zoological Museum, the town's green hinterland and Tring Reservoirs. Additional social facilities have also been sought for the young and elderly, with improved outdoor leisure facilities".

Tring would no longer be a compact market town and the farmland surrounding it would be built on. The development would go totally against this adopted vision for Tring.

22. Site Allocations 2006-2031 - The site was not allocated in the last round of sites in 2017, so must be considered as an unallocated greenfield site in the Green Belt.

In conclusion, the Chiltern Society considers the applicant's proposal to represent 'inappropriate development' in the Green Belt and outline planning permission should be refused. We further contend that Very Special Circumstances do not exist for allowing the development.'

We strongly object to this proposed development on Green Belt land to the east of Tring. The proposed scheme would result in the loss of open countryside, would go totally against the Council's Vision for Tring, and would adversely affect the local community. The applicant has failed to demonstrate that the benefits of the development clearly outweigh the harm that the development will cause with the loss of open countryside and its adverse impact on local biodiversity and

	environment."
The Countryside Charity	<p>I write with reference to the above speculative application in the Green Belt to which CPRE Hertfordshire will object strongly in due course. In the meantime, I should be most grateful if you would let me know the Council's position regarding your recent announcement in March that there will be a moratorium on issuing planning decisions which involve new houses throughout the Borough following Natural England advice.</p> <p>We understand that, as a result of your work on the Chiltern Beechwoods Special Area of Conservation (SAC), Natural England has advised you that a strategy needs to be prepared under the Habitat Regulations Assessment process to mitigate damage to the SAC. Until then, the issuing of planning decisions involving housing will be put on hold throughout the Borough.</p> <p>Presumably, the above application will be affected by this requirement, and we would appreciate your confirmation that this is the case, and any further details of the Council's intentions in this area. We are most supportive of the Council's work on the SAC which is a key countryside asset for the Borough and welcome any initiatives to maintain the environmental quality and character of the Chiltern Beechwoods.</p> <p><u>FURTHER COMMENTS RECEIVED 23.05.22</u></p> <p>I write with reference to the above planning application and await your response to the query raised in my letter of 27th April 2022 regarding the operation of the moratorium on the issuing of planning decisions related to the impact on the Chiltern Beechwoods Special Area of Conservation (SAC). Notwithstanding the status of the potential moratorium, CPRE Hertfordshire objects strongly to this speculative residential development covering over 120 hectares for the following reasons.</p> <ol style="list-style-type: none"> 1. The proposed development is located in the London Metropolitan Green Belt as defined in the adopted Dacorum Borough Core Strategy, according to criteria in the National Planning Policy Framework (NPPF). Development in the Green Belt is inappropriate unless very special circumstances apply and it is entirely inappropriate to suggest that an allocation in an emerging Local Plan is justification for the proposal in the present circumstances. 2. It is noted that Dacorum Borough Council has decided to defer further progress on its emerging Local Plan pending further information and evidence. This is due in large part to the huge public opposition to the Regulation 18 consultation to the many proposals

being made on designated protected land in the Borough.

3. It is perverse of the Applicant to suggest that this application should now be determined when the reasons for the deferral of the Local Plan are directly relevant to the consideration of this proposal. As a responsible local planning authority, Dacorum Borough Council rightly wishes its Local Plan to reflect local community concerns and aspirations, as required by the National Planning Policy Framework.

4. Responses to the Regulation 18 consultation overwhelmingly rejected proposals for development on the Green Belt throughout the Borough and local community concerns have been reflected in recent Ministerial statements re-emphasising the significance of designated protected land. This is particularly the case for the east of Tring growth area where this proposal would constitute a major encroachment on the Green Belt with significant impact on the openness of the countryside, and considerable expansion into land which provides important spaces between existing settlements, in direct contravention of the key reasons for Green Belt designation.

5. A key element in the consideration of this proposal should be the gradual accretion of residential developments in the Tring area. Reference may be made to the recently developed "Roman Park" and market housing developments between Aylesbury and Tring and the cumulative impact such developments have on the existing settlements and the open countryside in between. The character of Tring as a historic small market town will be jeopardised by this huge proposal with attendant problems of air quality, traffic generation and impact on social and community services.

6. The site borders the Chilterns Area of Outstanding Natural Beauty (AONB) to the north, south and east. Inappropriate development of the magnitude proposed would seriously and detrimentally affect the setting of the AONB. Of particular concern is the potential damaging impact of the additional 1400 households on the highly valued Chilterns Beechwoods SAC, as has been recognised by the recent Natural England instruction to impose a moratorium on planning decisions in this area.

7. The promotion of "Marshcroft" as a "garden suburb" is both misleading and inappropriate. In the Planning Statement, the Applicant notes that an "illustrative masterplan ... demonstrates one way in which the Marshcroft garden suburb could be developed to provide a sustainable settlement in accordance with garden communities principles."

8. There is extensive treatment of design issues as aspiration with no

detailed elaboration of what the place may look like in reality, even as examples. Design coding is promoted, as are issues relating to biodiversity, landscaping, and open space, without any specific indications of specific outcomes to illustrate how such elevated objectives may be achieved. Such an illustrative approach is entirely inadequate for a proposal of this magnitude.

9. The Applicant identifies the "failure of the local plan and plan-led system" as justification for the proposal on several occasions in the Planning Statement, and the need to provide further housing as the very special circumstances required for progressing with this application. This is to misrepresent fundamentally key elements of the local planning system which are to articulate local community concerns as much as to promote development which is inappropriate in this location by virtue of its planning status.

10. There continues to be significant debate about the objectives of the planning process and recent statements by former and present Ministers of Housing in response to queries by Welwyn Hatfield Borough Council and Daisy Cooper MP (from Minister of Housing Chris Pincher) and Jane Marson MP and Sir Oliver Heald MP (from Minister Stuart Andrew) and others including CPRE Hertfordshire, have reiterated the government's intention to resist development on Green Belt. These statements have policy weight and highlight the inconsistencies which have arisen recently in council and planning inspectors' decisions on applications and appeals on designated protected land throughout the County and further field.

11. To conflate issues relating to genuine local concerns for maintaining open countryside, and the inconsistencies in Government guidance with regard to the calculation of housing need leading to inflated housing targets and support for developers providing speculative market housing, is inappropriate. Very special circumstances need to relate to local conditions and be determined on the merits of each case rather than general matters which relate to the local planning system as a whole, as is asserted in the Planning Statement.

12. A similar argument relates to the provision of affordable housing. Recent research by CPRE Hertfordshire indicates the almost complete inability of speculative market housing to address in any meaningful way the demand for housing by average or below average income households in both Dacorum and Hertfordshire as a whole. The high proportion of "affordable housing" proposed is regarded by the Applicants as supporting the case for very special circumstances and again this is misleading.

	<p>13. Without a binding legal agreement to provide truly affordable housing for average earning households, with an appropriate provider, assertions by a developer in support of a planning application are meaningless. Too often, affordable housing proportions are reviewed by developers following the granting of planning permission, quoting viability issues, and statements of intent by the Applicant are inadequate to provide the security needed to ensure that appropriate affordable provision will be made.</p> <p>14. Notwithstanding our objection to the size of this proposal, the level of information provided for this application is inadequate with regard to the increasing requirements of the Environmental Act 2021 and Climate Change Acts. It is noted that an Environmental Assessment will be required and the scope of this should address the increasing attention to these issues being reflected in the recent Environment and Climate Change Acts.</p> <p>15. CPRE Hertfordshire continues to challenge the scale of development proposed for the Green Belt, based as it is on out-of-date information relating to future housing need, as we noted in our response to the Regulation 18 consultation. This is in addition to our opposition to the principle of allocating designated protected land for development; which is receiving increased attention and likely to be affected by provisions of the new Levelling Up and Regeneration Bill recently introduced in Parliament.</p> <p>16. It would be highly inappropriate for the Council to determine this application in advance of this new legislation which is seeking to respond to the justifiable concerns of the Government and local communities. We urge the Council to refuse this application on the basis of it being inappropriate development in the Green Belt and affecting the setting of the AONB.</p>
<p>Canal & River Trust</p>	<p>Thank you for your consultation.</p> <p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.</p> <p>The main issues relevant to the Trust as statutory consultee on this application are:</p>

- a) The impact on the structural integrity of the canal due to the proximity of the proposed works and drainage strategy.
- b) The impact on the reservoirs due to the drainage strategy.
- c) Accessibility and impact on canal bridges during construction and operation of the site.
- d) The impact on the character, appearance, and heritage of the waterway.
- e) The impact on the biodiversity of the waterway corridor.
- f) Energy Efficiency.

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that additional information, suitably worded conditions, and a legal agreement are necessary to address these matters. Our advice and comments follow:

The impact on the structural integrity of the canal due to the proximity of the proposed works and drainage strategy.

The site lies to the south-west of the Grand Union canal which is within a cutting at this point and at a significantly lower level than the site. In addition, to the north in close proximity to the site are the Wendover Arm of the Grand Union canal and Tringford, Startopend, Marsworth and Wilstone reservoirs with the Aylesbury Arm of the Grand Union canal further to the north.

It is important that development does not adversely affect the stability of the cutting slope to the Grand Union canal, as this could significantly increase the risk of damage to the adjacent canal. As you are aware, land stability is a material planning consideration and is referred to in paragraphs 174 & 183-184 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure, and the public.

We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability. We note that the application is in outline only, and that layout is a reserved matter. However, the

submitted Masterplan shows open space and attenuation ponds in close proximity to the top of the cutting slope to the Grand Union canal. We previously advised that any proposals should fully consider and assess any potential impacts to the canal and associated infrastructure and set out any necessary mitigation measures. Ideally this information should have been submitted with the outline application, though it does not appear to have been included.

On the basis that the built development is proposed to be substantially set back from the canal boundary this information could, as a minimum, be required as part of any detailed proposals for the open space /SANG and drainage systems. This is to ensure that the extent of the risk of such works to the stability of the cutting can be properly quantified and assessed. However, it should be noted that this may subsequently require amendments to the layout as indicated on the submitted Masterplan, such as relocating attenuation ponds further away from the cutting slope. It should therefore be clear that the Masterplan is only indicative and does not form part of any approval.

The information will need to include detail on the proposed construction methodology and a full inspection of the cutting to demonstrate that the development would not result in any increase in loadings to the cutting slope that could adversely affect its stability. With regards to the SuDs we will also need to know what impact the increased infiltration may have on the stability of the cutting both in the short and long term, as increases in local groundwater may have a detrimental affect on the structure over time as this would be a long term issue. Therefore, provisions for long-term monitoring and the future maintenance, management of the open space and SuDs systems should also be clearly detailed. The above could be addressed by suitably worded conditions.

The applicant/developer is also advised to review the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust", a copy of which can be found via our website.

The impact on the reservoirs due to the drainage strategy. This area is part of the catchment that feeds water into Marsworth, Startopsend and Tringford reservoirs. It is currently modelled as agricultural land with flows running through the area from adjacent catchments in large storm events (10,000year return and PMF event) that these reservoirs have to be designed for. Any change to the land use could affect the hydrographs for these inflows and require additional works at the development or reservoir to remove or mitigate the risks to the reservoirs.

As we advised previously, it is vitally important that these potential

impacts to the reservoirs are fully considered, though this does not appear to have been addressed in the current submission. The applicant/developer should provide further clarity on this matter prior to determination, with any necessary mitigation being set out at this stage or, as a minimum required as part of any future reserved matters submissions.

Accessibility and impact on canal bridges during construction and operation of the site.

The Trust encourage the use of our waterways and towpaths for leisure, recreation, and sporting activities as part of the natural health service, acting as blue gyms and supporting physical and healthy outdoor activity. The site is adjacent to the Grand Union canal corridor and is also close to, and has direct linkages to, the Wendover and Aylesbury Arms of the Grand Union canal and Tringford, Startopend, Marsworth and Wilstone reservoirs. These assets provide a significant free public resource for walking, cycling and access to green infrastructure, both of which can benefit the wellbeing of future residents.

The Trust generally seeks to maintain its assets in a "steady state", and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage the Trust's maintenance liabilities will also increase, and we consider that it is reasonable to request a financial contribution from developers to either cover increased maintenance costs, or to upgrade the towpath surface or assets such as bridges, to a standard which is more durable and thus able to accommodate increased usage without adding to the Trust's future maintenance costs.

The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers and could provide linkages between the site, urban areas, and local facilities such as Tring train station. The towpath would also aid in providing a safe, convenient, and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF.

The submission states that the development will link into the wider foot/cycle network, and this includes improved access to the Grand union towpath with potential direct access points shown on the Movement and access Parameter Plan. The recreational value of the canal and links to the reservoirs are also acknowledged. The Transport Statement recognises the benefit of the towpath to potential future occupiers, including the benefits it provides in providing a traffic free route to Berkhamsted, Hemel Hempstead, Watford, and links to the NCN Route 6.

The submission includes a range of off-site highway works which includes improved signage for the Grand union canal and the reservoirs with cycle parking also being proposed at Startops End Car park. These proposals are encouraging, and the Trust are happy to engage further with the applicant/developer as the plans progress. Nevertheless, considering the size of the proposed development and its proximity and direct linkages to the towpath the proposals have the potential to lead to significant increased usage of the towpath. The towpath at this location however is not in a condition that it could support additional footfall and the development should be required to provide for enhancements to mitigate against this impact.

The Trust can provide numerous examples of similar situations where developers have made accessibility improvements as a form of mitigation to either offset additional usage of the towpath to reach a site, or to improve access links onto the towpath for the benefit of both future residents and existing users and it is considered that this is necessary to conform to Policies CS8 (sustainable transport) and CS35 (Developer contributions) of the Core Strategy.

The Canal & River Trust therefore request that further discussions take place on these matters to determine if there is support for our request for a contribution, and if so, what would be considered to be an acceptable contribution in line with the Community Infrastructure Levy Regulations 2010 (as amended). Following that discussion, a further revised response will be provided.

In addition, there are Trust owned bridges in the immediate vicinity of the site and we previously advised that assessments of the potential impacts to these bridges from increased use by either vehicular or pedestrian traffic should be undertaken. There does not appear to have been any detailed assessment of the bridges, or potential impacts either during construction and operational phases nor any mitigation measures proposed to ensure that any physical risks to the canal infrastructure and heritage assets are avoided.

Further detail should therefore be provided, and any assessment should, as a minimum include consideration of Bridges nos. 133, 134, 135 & 136 on the Grand Union canal and Bridge nos. 1, 2 & 3 on the Wendover Arm of the Grand Union. Further detail on the traffic routes and management, with particular regard to the potential impact on existing canal bridges, is also required. We would currently advise that at the very least Bridge nos.2 & 5 (Wendover arm) and Bridge nos. 133 & 134 (Grand Union) are not suitable for use by construction traffic. The Trust wish to be reconsulted when the above information is available. The impact on the character, appearance, and heritage of

the waterway.

The indicative Masterplan shows that the proposal is for the majority of the development to be located a significant distance from the canal and therefore the impacts upon the canal corridor would appear to be limited.

The distinct stratification in the zoning of the proposal shown in the illustrative masterplan, with the Suitable Alternative Natural Greenspace (SANG) aligned parallel and contiguous with the canal cutting, has the advantage of not only protecting the landscape character of the immediate context of the canal, but also extending and enriching the green corridor of which the canal forms a spinal element.

The heritage statement and archaeological desk-based assessment have considered the potential impacts on the heritage significance of the waterway corridor with sufficient rigour. The mature line of vegetation along the canalside and the significant area of proposed green infrastructure running parallel to the canal means that there will be limited visual impact from the canal and towpath.

The impact on the biodiversity of the waterway corridor.

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The provision of additional landscaping and habitat enhancements to the canal boundary will aid in improving foraging opportunities for wildlife along the canal corridor.

It should however be ensured that any landscaping to the site boundary with the canal is of native species, appropriate to this waterside location and has regard for any potential impacts on the stability of the cutting slope. This matter could be addressed at reserved matters stage. The future maintenance and management regimes and responsibilities for the open space should also be provided and should be addressed by either a condition or planning obligation.

Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures should be provided. Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc. This could be addressed by the imposition of a condition requiring the submission of a Construction and Environmental Management Plan

Energy Efficiency

The Renewable Energy (Be Green) section of the Energy & sustainability Strategy does not seem to make any reference to heat pumps. There could be potential for an Energy Centre, supplying all the proposed dwellings via a Communal Heat Network and powered by heat pumps of one type or another, or even a combination and which could be the most cost-effective, lowest carbon and most sustainable option to support this development. The lack of any consideration of heat pumps in the submitted Energy & Sustainability Strategy is a significant omission and the applicant/developer should be required to provide further details to address this, either prior to determination or as part of any future reserved matters submissions.

The Trust wish to highlight the potential of the nearby canal as a more efficient source of net-zero carbon thermal energy, suitable for heating and cooling and we are happy to engage with the applicant/developer on this matter to see how Water Source Heat Pumps and the Grand Union Canal could provide on-site thermal energy for this development. The applicant/developer is advised to contact Maurice Bottomley, the Trust's Business Development Manager on 07551133369 or Maurice.bottomley@canalrivertrust.org.uk to discuss the options in relation to this and any commercial agreements that would be required.

For clarity the Trust currently consider that as a minimum, additional information is required in relation to the potential impact on the reservoir catchment, S106 contributions, assessment of potential impacts to canal bridge crossings and consideration of heat pumps. We request that we are re-consulted when this information is available.

We also currently recommend that conditions are required to address the matters listed below and these details should be required either prior to, or concurrent with, the submission of the first reserved matters application:

- Slope stability assessment of the cutting to the Grand Union canal and any necessary mitigation measures.
- Detailed drainage proposals, including assessment of impacts to GU cutting slope and reservoirs, any necessary mitigation measures and future maintenance and management responsibilities and regimes.
- Towpath access points
- Construction methodology.
- Construction traffic routes
- Habitat enhancements

- Landscaping / SANG maintenance and management regimes and responsibilities.
- Construction and Environmental Management Plan

The above is based on the information currently available and may be subject to review once additional information is provided.

Should planning permission be granted we would also request that the following informatives are appended to the decision notice:

- 1) The applicant/developer is advised to contact the Works Engineering Team on 0303 040 4040 in order to ensure that any necessary consents are obtained and that the works comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust".
- 2) The applicant is advised that any surface water discharge to the Grand union canal will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement. Please contact Chris Lee, Utilities surveyor on chris.lee@canalrivertrust.org.uk to discuss this further.

Please do not hesitate to contact me with any queries you may have.

FURTHER COMMENTS RECEIVED 13.07.22

Thanks for the additional information. With regards to the applicant's response our comments are as follows:

Structural Integrity of the canal - It is noted that the applicant's engineers have confirmed that the infiltration basins are sufficiently far away from the cutting though no further detail has been provided to substantiate this. The Trust therefore reiterate the advice in our original response that the Masterplan should be indicative only, and full details on construction methodology, including an inspection of the cutting, and future maintenance and management regimes and responsibilities should be secured by planning conditions/legal agreement.

Impact on feeder Reservoirs - This detail is currently being reviewed by our Water and Reservoir Engineers and we will respond as soon as possible on this.

Accessibility and increased use of towpaths - It is positive that the applicant/developer has acknowledged that a financial contribution in respect of the towpath, based on increased use due to the development, is in reasonable in principle and the Trust are happy to

work with the Council/applicant with regards to the drafting of any section 106 agreement. As advised previously the stretch of towpath improvement between Marshcroft Lane and Station Road would appear an appropriate focus for improvements, this equates to a length of approximately 1250m. We are currently working up the more detailed works/costings and will provide more detail as soon as possible. For information though the standard we would expect is Tar, spray and chip or we could also consider flexipave, with the current estimate for these works being £315/m.

Impact on Canal bridges - The potential routing for construction traffic appears reasonable avoiding all canal crossings. However, we still feel there should be an assessment of the potential impacts on the canal bridges highlighted from potential increased use arising from the proposed development with details of any necessary mitigation measures provided for consideration.

Water Sourced Heat Pumps using the canal - noted

Please do not hesitate should you wish to discuss any of the above. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The main issues relevant to the Trust as statutory consultee on this application are:

- a) The impact on the structural integrity of the canal due to the proximity of the proposed works and drainage strategy.
- b) The impact on the reservoirs due to the drainage strategy.
- c) Accessibility and impact on canal bridges during construction and operation of the site.
- d) The impact on the character, appearance, and heritage of the waterway.
- e) The impact on the biodiversity of the waterway corridor.
- f) Energy Efficiency.

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that additional information, suitably worded conditions, and a legal

agreement are necessary to address these matters. Our advice and comments follow:

The impact on the structural integrity of the canal due to the proximity of the proposed works and drainage strategy.

The site lies to the south-west of the Grand Union canal which is within a cutting at this point and at a significantly lower level than the site. In addition, to the north in close proximity to the site are the Wendover Arm of the Grand Union canal and Tringford, Startopend, Marsworth and Wilstone reservoirs with the Aylesbury Arm of the Grand Union canal further to the north.

It is important that development does not adversely affect the stability of the cutting slope to the Grand Union canal, as this could significantly increase the risk of damage to the adjacent canal. As you are aware, land stability is a material planning consideration and is referred to in paragraphs 174 & 183-184 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice Guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure, and the public.

We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.

We note that the application is in outline only, and that layout is a reserved matter. However, the submitted Masterplan shows open space and attenuation ponds in close proximity to the top of the cutting slope to the Grand Union canal. We previously advised that any proposals should fully consider and assess any potential impacts to the canal and associated infrastructure and set out any necessary mitigation measures. Ideally this information should have been submitted with the outline application, though it does not appear to have been included.

On the basis that the built development is proposed to be substantially set back from the canal boundary this information could, as a minimum, be required as part of any detailed proposals for the open space /SANG and drainage systems. This is to ensure that the extent

of the risk of such works to the stability of the cutting can be properly quantified and assessed. However, it should be noted that this may subsequently require amendments to the layout as indicated on the submitted Masterplan, such as relocating attenuation ponds further away from the cutting slope. It should therefore be clear that the Masterplan is only indicative and does not form part of any approval.

The information will need to include detail on the proposed construction methodology and a full inspection of the cutting to demonstrate that the development would not result in any increase in loadings to the cutting slope that could adversely affect its stability. With regards to the SuDs we will also need to know what impact the increased infiltration may have on the stability of the cutting both in the short and long term, as increases in local groundwater may have a detrimental effect on the structure over time as this would be a long term issue.

Therefore, provisions for long-term monitoring and the future maintenance, management of the open space and SuDs systems should also be clearly detailed. The above could be addressed by suitably worded conditions.

The applicant/developer is also advised to review the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust", a copy of which can be found via our website.

The impact on the reservoirs due to the drainage strategy.

This area is part of the catchment that feeds water into Marsworth, Startopsend and Tringford reservoirs. It is currently modelled as agricultural land with flows running through the area from adjacent catchments in large storm events (10,000year return and PMF event) that these reservoirs have to be designed for. Any change to the land use could affect the hydrographs for these inflows and require additional works at the development or reservoir to remove or mitigate the risks to the reservoirs.

As we advised previously, it is vitally important that these potential impacts to the reservoirs are fully considered, though this does not appear to have been addressed in the current submission. The applicant/developer should provide further clarity on this matter prior to determination, with any necessary mitigation being set out at this stage or, as a minimum required as part of any future reserved matters submissions.

Accessibility and impact on canal bridges during construction and operation of the site.

The Trust encourage the use of our waterways and towpaths for leisure, recreation, and sporting activities as part of the natural health service, acting as blue gyms and supporting physical and healthy outdoor activity. The site is adjacent to the Grand Union canal corridor and is also close to, and has direct linkages to, the Wendover and Aylesbury Arms of the Grand Union canal and Tringford, Startopend, Marsworth and Wilstone reservoirs. These assets provide a significant free public resource for walking, cycling and access to green infrastructure, both of which can benefit the wellbeing of future residents.

The Trust generally seeks to maintain its assets in a "steady state", and in the case of towpath maintenance, this is based on current usage. Where new development has the likelihood to increase usage the Trust's maintenance liabilities will also increase, and we consider that it is reasonable to request a financial contribution from developers to either cover increased maintenance costs, or to upgrade the towpath surface or assets such as bridges, to a standard which is more durable and thus able to accommodate increased usage without adding to the Trust's future maintenance costs.

The canal towpath is an important traffic free route for walking / cycling for both leisure and utility walkers and could provide linkages between the site, urban areas, and local facilities such as Tring train station. The towpath would also aid in providing a safe, convenient, and attractive walking and cycling network to promote health and well-being, consistent with the aims of the NPPF.

The submission states that the development will link into the wider foot/cycle network, and this includes improved access to the Grand union towpath with potential direct access points shown on the Movement and access Parameter Plan. The recreational value of the canal and links to the reservoirs are also acknowledged. The Transport Statement recognises the benefit of the towpath to potential future occupiers, including the benefits it provides in providing a traffic free route to Berkhamsted, Hemel Hempstead, Watford, and links to the NCN Route 6.

The submission includes a range of off-site highway works which includes improved signage for the Grand union canal and the reservoirs with cycle parking also being proposed at Startops End Car Park. These proposals are encouraging, and the Trust are happy to engage further with the applicant/developer as the plans progress. Nevertheless, considering the size of the proposed development and its proximity and direct linkages to the towpath the proposals have the potential to lead to significant increased usage of the towpath. The

towpath at this location however is not in a condition that it could support additional footfall and the development should be required to provide for enhancements to mitigate against this impact.

The Trust can provide numerous examples of similar situations where developers have made accessibility improvements as a form of mitigation to either offset additional usage of the towpath to reach a site, or to improve access links onto the towpath for the benefit of both future residents and existing users and it is considered that this is necessary to conform to Policies CS8 (sustainable transport) and CS35 (Developer contributions) of the Core Strategy.

The Canal & River Trust therefore request that further discussions take place on these matters to determine if there is support for our request for a contribution, and if so, what would be considered to be an acceptable contribution in line with the Community Infrastructure Levy Regulations 2010 (as amended). Following that discussion, a further revised response will be provided.

In addition, there are Trust owned bridges in the immediate vicinity of the site and we previously advised that assessments of the potential impacts to these bridges from increased use by either vehicular or pedestrian traffic should be undertaken. There does not appear to have been any detailed assessment of the bridges, or potential impacts either during construction and operational phases nor any mitigation measures proposed to ensure that any physical risks to the canal infrastructure and heritage assets are avoided.

Further detail should therefore be provided, and any assessment should, as a minimum include consideration of Bridges nos. 133, 134, 135 & 136 on the Grand Union canal and Bridge nos. 1, 2 & 3 on the Wendover Arm of the Grand Union. Further detail on the traffic routes and management, with particular regard to the potential impact on existing canal bridges, is also required. We would currently advise that at the very least Bridge nos.2 & 5 (Wendover arm) and Bridge nos. 133 & 134 (Grand Union) are not suitable for use by construction traffic. The Trust wish to be reconsulted when the above information is available.

The impact on the character, appearance, and heritage of the waterway.

The indicative Masterplan shows that the proposal is for the majority of the development to be located a significant distance from the canal and therefore the impacts upon the canal corridor would appear to be limited. The distinct stratification in the zoning of the proposal shown

in the illustrative masterplan, with the Suitable Alternative Natural Greenspace (SANG) aligned parallel and contiguous with the canal cutting, has the advantage of not only protecting the landscape character of the immediate context of the canal, but also extending and enriching the green corridor of which the canal forms a spinal element.

The heritage statement and archaeological desk-based assessment have considered the potential impacts on the heritage significance of the waterway corridor with sufficient rigour. The mature line of vegetation along the canalside and the significant area of proposed green infrastructure running parallel to the canal means that there will be limited visual impact from the canal and towpath.

The impact on the biodiversity of the waterway corridor.

The waterways have a rich biodiversity, with many areas benefiting from SSSI, SAC, SLINC or CWS designations. Developments can have an adverse impact on the ecology of the waterways. The provision of additional landscaping and habitat enhancements to the canal boundary will aid in improving foraging opportunities for wildlife along the canal corridor.

It should however be ensured that any landscaping to the site boundary with the canal is of native species, appropriate to this waterside location and has regard for any potential impacts on the stability of the cutting slope. This matter could be addressed at reserved matters stage. The future maintenance and management regimes and responsibilities for the open space should also be provided and should be addressed by either a condition or planning obligation.

Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should be avoided and details of pollution prevention measures should be provided. Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc. This could be addressed by the imposition of a condition requiring the submission of a Construction and Environmental Management Plan.

Energy Efficiency

The Renewable Energy (Be Green) section of the Energy & Sustainability Strategy does not seem to make any reference to heat pumps. There could be potential for an Energy Centre, supplying all the proposed dwellings via a Communal Heat Network and powered

by heat pumps of one type or another, or even a combination and which could be the most cost-effective, lowest carbon and most sustainable option to support this development. The lack of any consideration of heat pumps in the submitted Energy & Sustainability Strategy is a significant omission and the applicant/developer should be required to provide further details to address this, either prior to determination or as part of any future reserved matters submissions.

The Trust wish to highlight the potential of the nearby canal as a more efficient source of net-zero carbon thermal energy, suitable for heating and cooling and we are happy to engage with the applicant/developer on this matter to see how Water Source Heat Pumps and the Grand Union Canal could provide on-site thermal energy for this development. The applicant/developer is advised to contact Maurice Bottomley, the Trust's Business Development Manager on 07551133369 or Maurice.bottomley@canalrivertrust.org.uk to discuss the options in relation to this and any commercial agreements that would be required.

For clarity the Trust currently consider that as a minimum, additional information is required in relation to the potential impact on the reservoir catchment, S106 contributions, assessment of potential impacts to canal bridge crossings and consideration of heat pumps. We request that we are re-consulted when this information is available.

We also currently recommend that conditions are required to address the matters listed below and these details should be required either prior to, or concurrent with, the submission of the first reserved matters application:

- Slope stability assessment of the cutting to the Grand Union canal and any necessary mitigation measures.
- Detailed drainage proposals, including assessment of impacts to GU cutting slope and reservoirs, any necessary mitigation measures and future maintenance and management responsibilities and regimes.
- Towpath access points
- Construction methodology.
- Construction traffic routes
- Habitat enhancements
- Landscaping / SANG maintenance and management regimes and responsibilities.
- Construction and Environmental Management Plan

The above is based on the information currently available and may be subject to review once additional information is provided.

	<p>Should planning permission be granted we would also request that the following informatives are appended to the decision notice:</p> <p>1) The applicant/developer is advised to contact the Works Engineering Team on 0303 040 4040 in order to ensure that any necessary consents are obtained and that the works comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust".</p> <p>2) The applicant is advised that any surface water discharge to the Grand union canal will require prior consent from the Canal & River Trust. As the Trust is not a land drainage authority, such discharges are not granted as of right-where they are granted, they will usually be subject to completion of a commercial agreement. Please contact Chris Lee, Utilities surveyor on chris.lee@canalrivertrust.org.uk to discuss this further.</p> <p>Please do not hesitate to contact me with any queries you may have.</p>
<p>Conservation (DBC)</p>	<p>1. As the HRA implications have not yet been resolved, it seems premature to assume that the Marshcroft Development could satisfy those conditions - indeed in placing over 1,000 homes close to both Tring Park and Ashridge it will undoubtedly place undue further pressure on these special habitats. It is arguable that the whole of the site is too precious from a heritage perspective and should be retained to offset any further development within Tring itself. (The report states that 'a comprehensive package of visitor attractions' would be provided, without specifying what these would be, but again would these have the negative impact of pulling visitors away from the town centre.)</p> <p>2. Part of the site clearly formed part of the medieval and later park of Pendley Manor with evidence of the former site of the DMV close by. The parkland requires much more intensive mapping (eg 1806 map below) and analysis to understand its former extent, and the way, for example, Station Rd sliced through the original park. This scheme will have an impact on the setting of the house within its former parkland, and is a massive encroachment into it. There is a reference in the VSC to the scheme 'enhancing' the setting of Pendley Manor and other assets - there is no indication as to how this will (or indeed can) be achieved and is not referenced in the s.106 heads of terms. The interrelationship between Grove House and Pendley Manor requires much more research to unravel the landholding patterns across and around the site. Pendley Manor Lodge has recently had an application refused to develop a second dwelling in its grounds on the basis that this would undermine the planned, isolated setting of the Lodge. The Stables, Ivy Cottage (associated with the canal as a toll house) and the Canal itself as designated heritage</p>

assets also all have strong visual connections with the site.

3. The Heritage Statement in fact falls far short of what would be expected for understanding this site and its context (pp7-14), focusing as it states on the 'Built' Heritage (but still underplaying the importance of the industrial heritage and the seclusion of the stretch of the canal in this location.) As the archaeological investigations only cursorily touched on the medieval period, the importance of the site between the Anglo-Saxon period and the late C19th has escaped any analysis. Views of and from protected landscapes are ignored entirely, including particularly views over the site from Aldbury Nowers, Pitstone Hill etc. As is noted elsewhere, the top of the grade II* listed Bridgewater Monument on the periphery of the grade II* registered park and garden at the Ashridge estate is visible from the site. The heritage statement should embrace historic landscape features such as Marshcroft Lane, which provides a surprisingly undeveloped green route from Tring towards Pitstone Hill, field boundaries and other considerations relating to natural heritage. No analysis is made of the impact of the development in terms of affecting the interesting long-established historical disconnect between the town and the station and canal. Once the study embraces these wider features and understanding, the development would likely be re-assessed as causing significant harm.

4. There is no analysis of the impact a 'new' settlement of this size would have on the historic settlement of Tring (which though not Chester or York, is an important and early settlement and market town, with significant listed buildings such as the Church and Tring Mansion, and also a national Museum). The present site is a major, important area of countryside providing a green lung between the town and the AONB. It is difficult to see how this development would assist in sustaining or contributing to the heritage of Tring itself, and indeed might have a detrimental impact - in providing the comprehensive infrastructure promised- by either failing to contribute to the vitality and heritage of Tring town centre, or indeed possibly sucking life out of the core settlement.

5. In terms of design, the developer claims to deliver a 'garden community' but nothing in the application shows this aspires to create the kind of special place that garden city planning has achieved in the past. The development would need to be of a far higher standard of design to qualify for 'garden community' status or to meet the high design standards demanded by Green Belt policy.

It is difficult to see how the potential damage to the site's heritage assets, neighbouring listed buildings and their setting, Green Belt, and the AONB, can be offset by mitigation measures, as the harm cannot

be justified in terms of para 200 of the NPPF. There do not appear to be any 'true' VSCs to offset.

FURTHER COMMENTS RECEIVED 15.09.22

I have now seen the Doc 4a Parts 1 & Rev B, The Design Code Sept 2022 Sections 1-10, the Land East of Tring Landscape Response dated 11th August 2022 and also Urban Design Comments dated 2nd September 2022. My comments are as follows:

a) Unaddressed Heritage Matters

1. I have not seen any further analysis as requested of the parkland, requiring much more intensive mapping and analysis to understand its former extent, and the way, for example, Station Rd sliced through the original park. There is a reference in the VSC to the scheme 'enhancing' the setting of Pendley Manor and other assets, yet there is no indication as to how this will (or indeed can) be achieved. The interrelationship between Grove House and Pendley Manor requires more research to unravel the landholding patterns across and around the site. As the archaeological investigations only cursorily touched on the medieval period, the importance of the site between the Anglo-Saxon period and the late C19th has escaped any analysis. No analysis is made of the impact of the development in terms of affecting the interesting long-established historical disconnect between the town and the station and canal.

2. I also highlighted the Heritage Statement falls far short of what would be expected for understanding the whole site and its context, focusing as it does on the 'Built' Heritage (but still underplaying the importance of the industrial heritage, the seclusion of the stretch of the canal in this location and the importance of the heritage assets surrounding the site). The heritage statement should embrace historic landscape features such as Marshcroft Lane, which provides a surprisingly undeveloped green route from Tring towards Pitstone Hill, field boundaries and other considerations relating to natural heritage.

3. There is insufficient recognition of the potential harm that will be caused to heritage assets affected by the proposal:

a) Pendley Manor Group including the Manor House, Lodge, The Stables (all Grade II), and Home Farm (a model farmstead). The scheme will also complete the severance of the historical parkland (partially initiated by the construction of Station Road) by building over the remaining section within the development site.

b) Ivy Cottage (associated with the canal as a toll house) and the Canal itself.

- c) Marshcroft Lane group of non designated assets of Rothschild/Huckvale designed houses, located in the (presently) secluded quiet lane, together with the designated grade II listed bridge over the canal.
- d) Group of listed buildings at Bulbourne (canal workshops etc) grade II and the Grand Junction pub (non designated).
- e) Taking into account views of 1. The barrows at Aldbury Nowers - Neolithic / Bronze Age Scheduled Ancient monument. 2. Tring Park - a grade II listed Registered Park and Garden . 3 The top of the grade II* listed Bridgewater Monument on the periphery of the grade II* registered park and garden at the Ashridge estate

Once the study embraces these wider features and understanding, as groups of heritage assets, these all have visual connections with the site, which are underplayed in the Heritage Statement. In all of these cases, the scheme should be assessed as causing less than substantial harm to them.

4. Reference should be made to <https://www.gov.uk/government/publications/garden-communities> , which provides advice on how views play a part in setting, and how these contribute to the significance of the site, the heritage assets identified in the surrounding area and to an appreciation of the wider landscape. The Landscape Response in my view has underlined the significance of views and the impact the development would have on the setting of the AONB and blocking views of the Chilterns. I concur with the fundamental points made:

i) There are a number of public rights of way (including the Ridgeway National Trail) located on the high ground of the Chilterns escarpment, which afford distant open views of the site.

ii) Little mention is given of the views across and out of the site towards the Chilterns escarpment

iii) And notes how the development would impact on the 'intervisibility with the Chilterns AONB, large area of open agricultural land and lack of intrusive urbanising influences which creates a high scenic quality.'

iv) The new housing and in particular any new floodlighting would be noticeable, particularly in views from the east, and would bring light sources closer to the edge of the AONB.

It concludes:

My key concern with the landscape design relates to the views into and out of the AONB. Mitigation of a development of this scale, from

elevated viewpoints with existing open views over the site is extremely difficult.

The visual effects from the footpaths on the Chilterns escarpment to the east and south are underplayed. The proposed development would be a prominent new feature from a number of public vantage points including the Ridgeway National Trail. As set out within the baseline of the LVIA, the existing settlement of Tring is well integrated into the landscape. At construction and completion, the proposed development would be a stark new feature, clearly expanding the settlement edge.

The quantum and location of the development proposed results in a scheme that would have adverse effects on the setting to the Chilterns AONB, primarily in terms of views into and out of the designated landscape.

The development of the site would represent a substantial extension to Tring, with effects on local landscape character. Fundamentally the proposals would adversely affect the experiential qualities and visual experience of the Chilterns AONB, which would harm the setting to the AONB. This harm should be considered within the planning balance of the submitted application.

5. There is still insufficient analysis of the impact a 'new' settlement of this size would have on the historic settlement of Tring (which though not Chester or York, is an important and early settlement and small market town, with significant listed buildings such as the Church and Tring Mansion with a neighbouring national Museum). The present site is a major, important area of countryside in the Green Belt providing a green lung between the town and the AONB. It is difficult to see how this development would assist in sustaining or contributing to the heritage of Tring itself, and indeed might well have a detrimental impact - in providing the comprehensive infrastructure promised- by failing to contribute to the vitality and heritage of Tring town centre.

6. Comments on Design Proposals

The revised Design Document, in response to DBC comments, constructs 6 different character areas. An approach which attempts to introduce greater diversity and modulation between the different areas is to be welcomed. However, the justification for the character areas - reputedly drawn from local influences' - in fact only pay lip service to neighbouring historic features. The 'Suburban core' states that 'Grove Road and Tring Triangle' are its inspiration (although G.S.1 references 'central Tring instead) - yet these two areas could not be more

differentiated in terms of dates of development, form of housing, street pattern and plot layout etc. So inevitably in choosing these two wildly contrasting areas, it is difficult to detect whether they have had any meaningful impact on the character area.

It is not clear why the Village Centre, which is triangular in shape, should then reference the very linear form of Tring High Street; and any similarity is further diluted by possible car parking being located there - a sure way of undermining its function as public realm.

The Outer Garden Suburb claims to draw on the Arts & Crafts style of Marshcroft Lane, but it is difficult to see how the designs shown reflect any aspiration to create the beauty and form of the example in the Lane shown on p.140 (bottom left).

The Orchard is influenced by Bulbourne Village (?) reflecting 'typical barn clusters'. This certainly creates an opportunity to use 'timber boarding' and is welcomed but it is important to understand that the Chilterns is not populated with 'barn clusters' but with complex evolved farmsteads exhibiting a range of mass, volume, and design with a consequent hierarchy of structures and diversity in the choice of materials. Timber boarding can therefore be used to differentiate this character area but it needs to be proportionate, and equally there is no reason why timber boarding should be constrained exclusively to this character area. Rather bizarrely, this reference point also seems to justify the use of 'lanterns and clocks' (?).

The Station Road Character Area claims to draw inspiration from the 'wooded parklands of Pendley', ignoring the earlier extension of the parkland into the Marshcroft site, and also failing to reference the Stables and the Lodge as prominent visual landmarks along the east side of Station Road.

Finally, the manner in which the character areas could be better defined is in the use of innovative design, as encouraged by the AONB Design Guide and Technical Notes. This aspect of encouraging high quality design across the scheme is not addressed. In this respect the referencing to and use of 'heritage' for the character areas needs to be critically revised on the one hand, and a more innovative approach to design and creative use of eg traditional materials such as flint - introduced on the other.

7. Other comments on Design Proposals

6.47 says the Public Realm will reflect the history and heritage of the site, but does not provide any indication of how this would be represented.

6.53 The selection of trees could reference and draw inspiration from the parkland trees and pattern of landholding imposed by Pendley Manor.

8.8. Suggests gateway buildings to the entrance off Station Road - this would then provide a 'grander' entrance which failed to show respect locally to the provision of single lodges to Pendley Manor.

8.29 Materials - the choice of red brick would be critical and should be locally sourced. The use of concrete roofing materials should be resisted - ie clay tiles and natural slate should be specified. Flint, if used, should be only laid freehand - not concrete blocks (se AONB Technical Guides).

Only one area mentions chimneys - The Village Edge - an arbitrary choice whereas the whole site should consider chimneys to provide more visual enhancement to roofscapes.

The proposals do not appear to have taken into consideration the need for adapting designs to allow home-working.

Generally, for a site that is supposed to be sustainable, it is still overwhelmingly dominated by the car, hard surfacing, garaging etc. Connectivity with Tring itself is not adequately promoted. Shared utility provision does not appear to have been considered. It is also difficult to see how the site would not be used as an easy shortcut from the Upper Icknield way through to Station road, thus avoiding the challenging Wingrove Road/Brook Street route into Tring.

Whilst it is noted there may be some heritage gain in the provision of information boards and improvements to the canal towpath, the key heritage importance of the site is proposed to be encapsulated in a 'heritage garden'. This celebrates one early archaeological feature on the site, whereas there appears to be little acknowledgement or celebration of the extended historic development of the site, recognition of other previous settlement on the site, the importance of the medieval parkland and its connection with Pendley, the shaping of the agricultural landscape, and the impact of industrialisation with the canal and railway etc.

In conclusion:

It is difficult to see how the potential damage to the site's heritage assets, neighbouring listed buildings and their setting, Green Belt, and the AONB, (particularly affecting views from and to the Chilterns) can be offset by mitigation measures, as the harm cannot be justified in

	<p>terms of para 200 of the NPPF. There do not appear to be any 'true' VSCs to offset these losses in terms of a precious and important landscape, when the large number of dwellings proposed will undoubtedly alter the rural setting and character of the market town of Tring. The design proposals cherry pick some of the characteristic features of Tring's heritage assets and surrounding landscape, but fails to create distinctive character areas. Rather than integrating the scheme into the market town, the design approach dilutes the integrity of the scheme, which consequently fails to make its mind up what it aims to be, and severs it further from the settlement it purports to be a part of.</p>
<p>Strategic Planning & Regeneration (DBC)</p>	<p>Thank you for the ability to provide feedback on the aforementioned application. Strategic Planning wish to provide the following high-level response which focusses on a small number of specific but important matters. On more detailed matters, Strategic Planning suggests that the case officer gives sufficient weight to feedback received from other relevant consultees.</p> <p>Habitats Regulations Assessment (HRA)</p> <p>Following the publication of the Footprint Ecology Report in March 2022 and subsequent advice from Natural England, (www.dacorum.gov.uk/sac) the proposal is screened in for the purposes of HRA. Dacorum Borough Council is the Competent Authority on this matter and will need to undertake an appropriate assessment to ensure that the integrity of the Chilterns Beechwoods SAC is not adversely affected by this proposal.</p> <p>The requirement to carry out this assessment, including any mitigation considered necessary to offset pressures, should not be regarded as a material consideration to be weighted into the planning balance as other material considerations would be.</p> <p>It is important to consider the formal responses from Natural England and Hertfordshire Ecology (Hertfordshire County Council) to the proposed scheme before setting out what additional information, if any, is necessary to inform the appropriate assessment.</p> <p>Existing and Emerging Policy Context</p> <p>The application site is located to the north east of the existing built up area of Tring, and is wholly designated as Green Belt land. The site is a draft allocation in the emerging Local Plan, which was subject to formal public consultation (Regulation 18) between November 2020 and March 2021.</p>

Following consultation, a report was published in June 2021 highlighting the key issues raised. With this, significant objections were raised to many core proposals in the draft Local Plan, including the overall Spatial Strategy, the proposed Delivery Strategy for Tring, and the proposed allocation Tr03: East of Tring, to which the application site closely aligns itself to.

Having regard to paragraph 48 of the NPPF, only very limited weight can be afforded to the site's inclusion in the emerging Local Plan.

The application is premature to the delivery of the new Local Plan, and does not wholly align itself with the emerging delivery strategy for Tring, including the need for comprehensive development with other draft allocations to the west and south. Strategic Planning therefore recommends that the principle of development must be assessed against the requirements of National Policy and where relevant adopted local policies, rather than emerging policy.

Should the case be made that the emerging Local Plan is sufficiently advanced or that the draft allocation should be given more weight than currently afforded by Strategic Planning, it is recommended that permission should be refused on grounds of prematurity in accordance with Paragraph 49 of the NPPF.

Principle of development and Very Special Circumstances (VSC)

Paragraphs 147 to 151 of the NPPF ("Proposals affecting the Green Belt") are most important for considering the principle of development in this instance. The application includes proposals for new buildings considered inappropriate development in the Green Belt. With this, the proposal taken as a whole, needs to demonstrate 'very special circumstances', sufficient enough to justify the principle of development in this location.

Paragraph 148 of the NPPF makes clear that 'very special circumstances' (VSC) will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The current Green Belt study confirms that the application site (Parcels TR-A2 and TR-A3 in the study) makes a strong contribution to the purposes of the Green Belt.

The current proposal seeks to deliver up to 1,400 dwellings and supported by a range of infrastructure, including new community facilities across 121 hectares of land. With this, Strategic Planning consider the scale of inappropriate development in the Green Belt to be substantial.

The applicants have submitted as part of their proposals a "Section 106 Heads of Terms and Very Special Circumstances Statement". Appendix 1 of that statement includes a table indicating those circumstances in turn.

The first page of this table relates mainly to the failure of the Local Plan and the appropriate delivery of different forms of housing. While Strategic Planning recognises that these could form part of the case for VSC, and has been demonstrated elsewhere in the Country (principally through planning appeals), it is considered that the situation in Dacorum is somewhat different, for the reasons set out below:

- o While accepting that there is a lack of a five year supply in Dacorum, Strategic Planning does not accept that the shortfall in supply is so acute as to tilt the planning balance in this instance, particularly with respect to delivery of market housing.
- o Strategic Planning does not accept that the application will make a contribution towards improving its housing supply position in the next five years given the scale of development proposed and likely timescales for implementation.
- o The Housing Delivery Test (HDT): 2021 measurement makes clear that the borough has delivered in excess of the target set by Government for 2020/21. 755 new dwellings were completed, a record year for delivery despite the impacts of the global pandemic on the construction industry during that time. It surpasses the requirement of 681 dwellings set by the Department for Levelling Up Housing and Communities.
- o On affordable housing provision, the Council has an ambitious programme for delivery on this, including direct provision of housing in the borough. The most recent monitoring report has demonstrated that 162 affordable homes were completed in 2019/20, representing 33% of all completions in that year .
- o Strategic Planning accepts that more can be done on delivery in the future, as set out in the Council's HDT Action Plan. The 2021 results for Dacorum is 87% of the total number of homes required over the past three years. While this indicates a need for a further review of the Council's HDT Action Plan, it is not so severe that a 20% buffer is required for the purposes of calculating housing supply, or that the presumption in favour of sustainable development applies as a consequence of past under delivery (the presumption does apply as a result of a lack of a five year supply).

Strategic Planning does not accept the failure of the Local Plan as a valid reason to justify VSC in this instance. It is accepted that current delays are not helpful, but these are ultimately defined by the legal

processes of plan making. With this the Council is doing all that it can to ensure that legal processes which underpin the new Local Plan are followed.

The second page of the table relates to the delivery of a range of education, sport and health facilities. These can reasonably form part of the case for VSC, however Strategic Planning notes a degree of a caution about the extent to which these facilities go above and beyond the basic requirements of the site. This will in-part depend on the responses from lead authorities, other organisations and bodies on these elements of the VSC.

The final page of the table considers, amongst other matters, the delivery of SANG to offset recognised pressures and harm currently being experienced on the Chilterns Beechwoods SAC. The delivery of SANG alongside other mitigation is mainly a product of the legal processes underpinning the Habitats Regulations. As indicated at the start of this response, it is not something that should form part of the planning balance. On this basis, Strategic Planning therefore advise that SANG (and any other mitigation considered necessary to offset impacts) is not a valid part of the VSC case. For Dacorum going forward, the need for SANG on many large scale development proposals is expected to become 'the norm'.

It is also noted that SANG, alongside any other appropriate HRA mitigation measures, needs to be in place ahead of occupation. With this, Strategic Planning further questions the ability for this site to make a meaningful contribution towards improving housing supply in the short term.

In summary, Strategic Planning object to the development as proposed. It is considered that development will result in significant harm to the Green Belt in this location, as evidenced through relevant studies informing the Local Plan. With this, the NPPF at Paragraph 148 affords substantial weight to this matter. The level of harm is significant, owing to the scale of built form proposed. Having reviewed the VSC case as put forward by the applicants, Strategic Planning does not consider the case is sufficient to outweigh the harm caused by reason of inappropriateness.

This advice is provided on the basis that the current housing supply position is not so acute as to 'tip the balance' in this instance, and that the application as proposed is unlikely to many any meaningful contribution to housing delivery in the short term.

Strategic Planning is happy to consider and respond to any further matters as requested by the case officer, recognising the complex and

	multi-faceted nature of this application.
Rights Of Way (DBC)	<p>This site is crossed by footpaths Tring Town 57 and Aldbury 65 on the eastern boundary, between Station Road and Marshcroft Lane. It is also abutted by Public footpath Tring Town 58 on the remainder of the eastern boundary between Marshcroft Lane and Bulbourne. On the other side of the Grand Union Canal (GUC) footpaths (Tring Town 61 and Aldbury 64) run from Bulbourne to Station Road.</p> <p>Marshcroft Lane has a status of Restricted byway from the GUC. Making it a non-vehicular route for the public. This links to Northfield Road and then, via a network of rights of way, to the National Trust Ashridge Estate.</p> <p>Clearly a development of this size will alter forever the nature of the paths along the canal which will come under such increased pressure that they will almost certainly be in need upgrading and increased on-going maintenance due to increased use and expectations.</p> <p>A development of this size will also add significant pressure to the wider PRoW network and other amenities in the locality. Including the GUC, the wildlife site of Aldbury Nowers and the Ashridge Estate.</p>
Trees & Woodlands	<p>The development will require the removal of 2 x horse chestnut trees (T100 & T100.5) and a group of hawthorn (G107) and a mixed group (G157). Owing to the size of the development and opportunity to mitigate tree loss through the planting of both urban trees and within the SANG I consider the proposal acceptable in principle.</p> <p>Further information is required to determine if planting is acceptable. This should be in the form of an urban planting scheme inclusive of species, size, aftercare and replacement (if necessary) in accordance with BS 8545:2014 Trees: from nursery to independence in the landscape. The planting scheme species choice should take into account the potential impact of climate change and offer opportunities of shade in exposed public areas.</p> <p>In addition, information relating to planting within the SANG shall take a similar good practice approach (BS8545) but also incorporate protection against animal damage through species choice and guarding/fencing (individual and group).</p> <p>Finally, a programme of continued tree maintenance in perpetuity of the development must be included to ensure all existing trees and new plantings are supported. This shall include a regular inspection and maintenance programme to safeguard the public from foreseeable hazards and access is available.</p>

<p>Environment Agency</p>	<p>The site is located within an SPZ3 (source protection zone), however, as neither the previous nor proposed uses pose a high contamination risk then it falls below our risk bar in terms of groundwater and contaminated land. Similarly, the site is located within only Flood Zone 1 and whilst the site is proposed parallel to the Grand Union Canal Regent's Canal, this is not one of our designated main rivers and therefore falls below our risk bar for consultation in terms of flood risk.</p> <p>For future reference, I have attached our External Consultation Checklist which provides a list of details for when we would need to be consulted on an application. This includes a list of previous/proposed uses that we consider posing a high contamination risk.</p>
<p>Environmental And Community Protection (DBC) – Land Contamination</p>	<p>Having reviewed the relevant documentation submitted with the above planning application and having considered the information held by the ECP Team I am able to confirm that there is no objection to the proposed development on the grounds of land contamination.</p> <p>However, as a result of the residential nature of the development proposed and the potential for the application site to be impacted by contamination, as concluded by the BWB Phase I Geo-Environmental Assessment Report (March 2022), it will be necessary for the following conditions to be included on any permission that is granted.</p> <p>Contaminated Land Conditions:</p> <p>Condition 1:</p> <p>(a) No development approved by this permission shall be commenced until an intrusive site investigation report has been submitted to and approved by the Local Planning Authority which includes:</p> <p>(i) A full identification of the location and concentration of all pollutants on this site and the presence of relevant receptors, and;</p> <p>(ii) The results from the application of an appropriate risk assessment methodology.</p> <p>(b) No development approved by this permission (other than that necessary for the discharge of this condition) shall be commenced until a Remediation Method Statement report; if required as a result of (a), above; has been submitted to and approved by the Local Planning Authority.</p> <p>(c) This site shall not be occupied, or brought into use, until:</p>

(i) All works which form part of the Remediation Method Statement report pursuant to the discharge of condition (b) above have been fully completed and if required a formal agreement is submitted that commits to ongoing monitoring and/or maintenance of the remediation scheme.

(ii) A Remediation Verification Report confirming that the site is suitable for use has been submitted to, and agreed by, the Local Planning Authority.

Reason: To ensure that the issue of contamination is adequately addressed to protect human health and the surrounding environment and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32.

Condition 2:

Any contamination, other than that reported by virtue of Condition 1 encountered during the development of this site shall be brought to the attention of the Local Planning Authority as soon as practically possible; a scheme to render this contamination harmless shall be submitted to and agreed by, the Local Planning Authority and subsequently fully implemented prior to the occupation of this site. Works shall be temporarily suspended, unless otherwise agreed in writing during this process because the safe development and secure occupancy of the site lies with the developer.

Reason: To ensure that the issue of contamination is adequately addressed to protect human health and the surrounding environment and to ensure a satisfactory development, in accordance with Core Strategy (2013) Policy CS32.

Informative:

The above conditions are considered to be in line with paragraphs 174 (e) & (f) and 183 and 184 of the NPPF 2021.

Guidance on how to assess and manage the risks from land contamination can be found here

<https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

Please let me know if you would like to discuss this advice.

With regards to local air quality matters it is considered extremely unlikely that it will be able to provide a recommendation before Wednesday 4th May 2022. This reflects the amount of reading and assessment required and the need to agree any final response within

	<p>the EPC Team. It may also be necessary to discuss issues with HCC and the developer and/or their air quality specialist, but this will be known once the documentation has been initially assessed.</p> <p>With all of the above in mind, please would you let me know what length of a time extension would be manageable for you.</p>
<p>Historic England</p>	<p>The site in question is situated on agricultural land to the east of the town of Tring and about 2.5 miles in a straight line from the National Trust Ashridge Estate. The top of the grade II* listed Bridgewater Monument on the periphery of the grade II* registered park and garden at the Ashridge estate is visible from the site.</p> <p>The site is surrounded by grade II listed heritage assets. A Heritage Impact Assessment for the site has been produced in line with Historic England comments at regulation 18.</p> <p>Historic features within the historic designed landscape at Ashridge are acknowledged as being impacted by the same recreational pressure that is affecting the co-located Chilterns Beechwoods Special Area of Conservation and Ashridge Commons and Woods SSSI, for which Dacorum Council has undertaken Habitats Regulations Assessment work as part of its emerging Local Plan.</p> <p>The proposed development would result in a further 1,400 homes being built within a 2.5 mile distance of Ashridge which would contribute to the already acknowledged impacts of recreational pressures on the Ashridge Estate. In an attempt to address this, the proposed development includes c27 hectares of Suitable Alternative Natural Greenspace (SANG) developed with input from Natural England, Dacorum Borough Council and Hertfordshire Ecology. This is intended to provide publicly accessible open space of sufficient quality to serve as an alternative for some recreational visits to the sensitive sites at the Ashridge estate (and to a lesser extent the grade II registered Tring Park), and will delivered ahead of occupation of new dwellings.</p> <p>Policy Context</p> <p>Paragraph 199 of the NPPF indicates that when considering the impact of a proposed development upon the significance of a designated heritage asset, great weight shall be given to the assets conservation (the more important the asset, the greater the weight should be).</p> <p>Paragraph 200 of the NPPF states any harm to, or loss of, the significance of a designated heritage asset (from its alteration or</p>

	<p>destruction, or from development within its setting) should require clear and convincing justification.</p> <p>Paragraph 202 states that where a proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.</p> <p>Historic England Position</p> <p>Historic England consider that the development would contribute to recreational pressure already causing damage to features within the grade II* registered landscape at Ashridge. We acknowledge that the proposed development includes early delivery of c27 hectares of SANG. It is not within our remit to determine the suitability of the proposed SANG, but your authority, in consultation with Natural England and Hertfordshire Ecology, must be convinced that it will adequately serve the intended purpose and thus be in accordance with paragraphs 199 and 200 of the NPPF. Your local authority should then weigh up the planning balance as required by paragraph 202 of the NPPF.</p> <p>Recommendation</p> <p>Historic England has some concerns relating to this application on heritage grounds.</p> <p>We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 199 and 200 of the NPPF.</p> <p>In determining this application you should bear in mind the statutory duty of section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.</p> <p>Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.</p>
<p>Forestry Commission</p>	<p>Here at the Commission we do not have the powers to approve or object to a planning application, but we do check planning details to find if there will be any negative impact on woodlands, and particularly ancient woodlands and veteran trees. If impacts may be a problem we then give advice on how best to mitigate or compensate for any loss or damage.</p>

	<p>From my mapping checks I noted there are no ancient woodlands on or near the proposed development area, and no loss of other woodland.</p>
<p>Historic Environment (Archaeology) (HCC)</p>	<p>The applicant's archaeological agents have consulted extensively with HCC's archaeological advisors in relation to this planning application. In line with our advice they have carried out a geophysical survey (MOLA 2021) and subsequent limited trial trenching evaluation (Cotswold Archaeology 2022) to provide a preliminary assessment of the archaeological resource likely to be impacted by the development. The primary objective of these evaluations was to determine whether there were likely to be any remains present of national significance, as per NPPF paras. 194 and 200 footnote 68.</p> <p>The proposed development site was already known to contain a cropmark of an enclosure of probable Late Iron Age or Roman date [Historic Environment Record No 2557]. The investigations identified some evidence for agricultural activity of prehistoric date, but predominantly further evidence for settlement of Late Iron Age/Roman date, some of which is of regional significance. This included Late Iron Age/Early Roman agricultural enclosures, and possibly a small settlement with an industrial area, which produced evidence of metalwork production, in the south east of the site, and also evidence of Late Iron Age/Early Roman period activity near the centre of the site, on the periphery of enclosure [HER 2557]. The evaluation also identified (undated) remains of a trackway and possible field systems which are likely to be of medieval or post-medieval date.</p> <p>The two evaluations have provided a considerable amount of additional archaeological information which has allowed broad characterisation of the archaeology of the proposed development site.</p> <p>The information provided is, on balance, sufficient to allow the application to be determined. . It is important that the entire proposed development site is now subject to a further phase of trial trenching evaluation in order to determine the extent of the archaeological remains, followed by mitigation in the form of either open area excavation or preservation in situ of remains. This can be carried out by condition on consent.</p> <p>I believe that the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and I recommend that the following provisions be made, should you be minded to grant consent:</p> <ol style="list-style-type: none"> 1. The further archaeological evaluation, via trial trenching, of the proposed development site, prior to the commencement of

development;

2. such appropriate mitigation measures indicated as necessary by that evaluation. These may include:

- a. the preservation of any remains in situ, if warranted,
- b. appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results,
- c. archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered),
- d. A programme of archaeological outreach to accompany any mitigation measures;

3. The analysis of the results of the archaeological work with provision for the subsequent production of a report and an archive, and the publication of the results;

4. such other provisions as may be necessary to protect the archaeological and historic interests of the site.

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 205, etc. of the National Planning Policy Framework (2021), relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case two appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

Condition A

No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:

1. The programme and methodology of site investigation and recording
2. The programme and methodology of site investigation and recording as suggested by the archaeological evaluation
3. The programme for post investigation assessment

	<p>4. Provision to be made for analysis of the site investigation and recording</p> <p>5. Provision to be made for publication and dissemination of the analysis and records of the site investigation</p> <p>6. Provision to be made for archive deposition of the analysis and records of the site investigation</p> <p>7. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.</p> <p>Condition B</p> <p>i) Any demolition/development shall take place in accordance with the Written Scheme of Investigation approved under Condition A.</p> <p>ii) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.</p> <p>If planning consent is granted, I will be able to provide detailed advice concerning the requirements for the investigations, and to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.</p> <p>I hope that you will be able to accommodate the above recommendations.</p> <p>Please do not hesitate to contact me should you require any further information or clarification.</p>
<p>Education (HCC)</p>	<p>You'll be aware that our requirement for a new secondary school within Tring, was based upon the regulation 18 draft Dacorum Local Plan (2020-2038), Emerging Strategy for Growth, which contained a delivery strategy for Tring that aimed to deliver 2,730 dwellings during the plan period. This took the form of three growth areas that would deliver the bulk of these dwellings (East of Tring: 1,400 dwellings, New Mill: 400 dwellings and Dunsley Farm: 400 dwellings). The county council's response to this consultation in February 2021 therefore supported this strategy, as the proposed level of growth for Tring, necessitated the need for a new secondary school and two new primary schools.</p> <p>Current Background to Education in Tring</p> <p>Capacity and Demand. Current forecast figures for Tring show a close</p>

match between supply and demand, with a small deficit forecast in many years across both primary and secondary phases. Existing capacity is very limited across the town for both primary and secondary and in many cases will have aged out of the system before the East of Tring development is completed. Ideally, a small level of surplus would be available to help accommodate in-year admissions from families moving into the area and cohort growth beyond the normal year of admission. No surplus in the town can therefore be assumed to be available to meet additional demand arising from the East of Tring development.

It is projected that the development of 1,400 units at East of Tring could produce just under 2.4 forms of entry (FE) of additional children, based on up-to-date evidence from the county council's Pupil Yield Study. There is currently insufficient capacity at local schools to accommodate this level of additional demand at both the primary and secondary phases, and forecasts indicate that this will continue to be the case in the short-to-medium term. More recently, net in-year migration has also increased, which is putting additional pressure on primary school places and will likely, in turn, put additional pressure on secondary school places when these children age through.

Pupil Dynamics. At the secondary phase, the Tring area has a level of interaction with bordering towns in Buckinghamshire, with a number of children from Tring seeking education in the Buckinghamshire Grammar School system and, in some years, Buckinghamshire children obtaining places at Tring School. This means there is the potential for more volatility in numbers, especially with larger cohorts due to age through to the secondary phase, where small changes in dynamics may result in more pressure within Tring for secondary school places.

The Tring area has little interaction with other parts of Hertfordshire and very few children attend mainstream schools in other Hertfordshire settlements. The county council will seek to accommodate Tring residents at education provision within the town (or any extension thereof).

Education Strategy. Tring will require additional school places, at both the primary and secondary phase, as a result of need development. The form those additional places will take will be dependent on the level of growth which takes place over the next 15+ years.

At the primary phase, a new school site capable of providing a school of up to 3FE is required to ensure the impact of the development can be mitigated given the existing pressure on places. The county council expects new school sites to meet the size and physical standards set

out in appendix 2 of the county council's Guide to Developer Infrastructure Contributions (2021). It appears from the application that the proposed site does not meet those standards.

As stated previously, should further development across Tring come forward, as set out in the delivery strategy for Tring in regulation 18 draft Dacorum Local Plan, a second new primary school site would be required. Based on this delivery strategy, the county council has previously indicated that the East of Tring site would be the preferred location for both new primary schools in the growth scenario set out in the draft regulation 18 plan. However, as a standalone application, a single serviced site of appropriate size (i.e. 2.92ha) would be acceptable mitigation.

At the secondary phase, this development would not likely yield sufficient pupils to make a new secondary school deliverable or sustainable. However, a serviced secondary school site of suitable size would allow the county council flexibility for new education provision to be delivered at the appropriate time and in the right form, responsive to actual demand and growth across the next plan period.

Expansion of Tring School, with a split-site solution, may be a more appropriate and deliverable option should growth be limited in the town (e.g. major development limited to the East of Tring site alone). However, this would still require additional land (a serviced site) to enable this to be delivered, with some additional cost and space implications arising from the split-site build and the potential need to duplicate some facilities. This would be one option for the land identified within the application.

Alternatively, a higher level of development in the wider area than East of Tring alone may require education provision of the scale that a new standalone school (albeit potentially within a Multi-Academy Trust) would be viable, deliverable and the most appropriate strategy, even were this to be substantially delivered late or even beyond the draft plan period. The county council's preference therefore is to identify and reserve a serviced site capable of delivering a new secondary school for this potential scenario, with no limitations on the type of (education) project it will accommodate or artificial delivery dates, to enable flexibility for new education provision to be delivered at the appropriate time and in the right form.

Until the revised regulation 18 draft local plan is published, (which we anticipate will be in June 2023), the delivery strategy for Tring remains unclear and there is currently uncertainty as to the number of dwellings a revised strategy may contain. Therefore, the county council as Education Authority cannot support any delivery date for a

new secondary school on the application site (or even new provision as set out above) as stated as being in September 2027 within the accompanying Section 106 Heads of Term & Very Special Circumstances Statement and the Education Infrastructure Assessment. To enable flexibility to best serve the Tring area, delivery (whichever strategy that takes) must be unconstrained so that it can be brought forward when it is needed and at an appropriate scale and form for growth in the town.

In the light of the above, we would be keen to discuss this directly with the applicant in due course.

FURTHER COMMENT RECEIVED 09.09.22

I am writing in respect of additional planning obligations that are sought for this outline planning application. Hertfordshire County Council (HCC) recognises that the site is situated within the borough council's CIL zone 2 charging area (with a tiny proportion of the south-eastern corner falling within CIL zone 1. However, to mitigate the impact of the development on secondary school places in the area, it is considered that the development of 1,400 dwellings on this site requires additional financial contributions towards primary and secondary education within the proposed Section 106 agreement.

Summary

You'll be aware that any previous requirement expressed by HCC for new primary and secondary schools within Tring, was based upon the November 2020 Regulation 18 Draft Dacorum Emerging Strategy for Growth Local Plan (2020-2038). This draft plan contained a delivery strategy for the settlement that aimed to deliver 2,730 dwellings during the plan period. This took the form of three growth areas that would deliver the bulk of these dwellings (East of Tring: 1,400 dwellings, New Mill: 400 dwellings and Dunsley Farm: 400 dwellings). The delivery strategy included the provision of a new secondary school and two new primary schools and was supported by the county council in principle in our response to this consultation in February 2021.

Since this consultation took place, Dacorum Borough Council has decided to revise the overall growth strategy for the borough. The borough council has indicated that a revised regulation 18 draft local plan with a new set of individual settlement delivery strategies will be published for consultation in June 2023, meaning that the current delivery strategy for Tring remains unclear. The county council cannot therefore continue to support the level of primary and secondary school provision that was suggested for Tring within the November 2020 draft local plan, until a revised development strategy for the

settlement is published by the borough council.

Application Proposals

This planning application provides land for a new two form entry (2fe) primary school to serve the proposed development, with room for expansion (which the applicant proposes to fund and construct), along with land towards the delivery of a new 6fe secondary school, with a sixth form and room for expansion.

We have modelled the proposed development using the Hertfordshire Demographic Model, which projects the average number of children likely to emerge from different types, sizes and tenures over time. This is further outlined in the county council's adopted Guide to Developer Infrastructure Contributions. The figure included in the modelling is based upon the development mix that is outlined in the application form and the build trajectory listed in the Planning Statement:

Estimated Development Mix

Estimated Trajectory

PLEASE NOTE: If the tenure or mix of dwellings changes, please notify us immediately as this may alter the contributions sought.

At 1,400 dwellings, the modelling suggests that the peak pupil yield arising from this scheme is approximately 2.4fe in 2036 for primary and approximately 2.3fe in 2042 for secondary. This equates to an estimated 497 primary school pupils and 343 secondary school pupils). The modelling is on the assumption that construction commences in 2023 and the first dwellings are occupied in 2025. It also suggests that the pupil yield is sufficient to justify the allocation of land for a new primary school within the application site and this is supported in principle by the county council.

However, it is considered that the need for a new secondary school has not been established by either the estimated pupil yield being generated by the development or the appropriate progression of the local plan. This means the county council cannot agree to any timeframe for the opening of a new secondary school due to the uncertainty surrounding the commencement of this development (if approved) and any other sites that may (or may not) come forward within the Tring area.

Tring Education Assessment

Current forecast figures for Tring show a close match between supply and demand, with a small deficit forecast in many years across both

primary and secondary phases. Existing capacity is very limited across the settlement for both primary and secondary and in many cases will have aged out of the system before the East of Tring development is completed. Ideally, a small amount of surplus would be available to help accommodate in-year admissions both from families moving into the area and cohort growth beyond the normal year of admission. No surplus in the town can therefore be assumed to be available to meet additional demand arising from the East of Tring development.

The county council considers that there is currently insufficient capacity at local schools to accommodate the level of projected demand that may arise from the application site, at both the primary and secondary phases. Forecasts indicate that this will continue to be the case in the short-to-medium term. More recently net in-year migration has also increased. This is putting additional pressure on primary school places and will likely, in turn, put additional pressure on secondary school places when these children age through.

Pupil dynamics in the Tring area at the secondary phase has a level of interaction with bordering towns in Buckinghamshire. A number of children from Tring seek education in the Buckinghamshire Grammar School system and, in some years, Buckinghamshire children obtain places at Tring School. This means there is the potential for more volatility in numbers, especially with larger cohorts due to age through to the secondary phase. Small changes in dynamics may result in more pressure within Tring for secondary school places. The Tring area has little interaction with other parts of Hertfordshire and very few children attend mainstream schools in other Hertfordshire settlements. The county council will seek to accommodate education provision for Tring residents within the settlement (or any extension thereof).

Primary School Site

The county council expects new primary school sites to meet the size and physical standards set out in appendix 2 of the county council's Guide to Developer Infrastructure Contributions (adopted in 2021). The land take for a new 2fe primary school is 2.03ha and 2.92ha for a new 3fe primary school. The accompanying Planning Statement indicates that 3ha of land will be set aside for a new primary school. This meets the amount of land area outlined within the adopted guide and this would be acceptable mitigation, should new development in Tring solely consist of the application site.

Whilst the application proposes that the developer will fund and construct the new primary school, upon the occupation of the 465th dwelling (which is estimated to be within four years after the date of

development's commencement), the county council prefers a serviced site and developer contributions, via a Section 106 agreement.

Secondary School Site

To reiterate, the need for a new secondary school has not been established by either the development proposed within this application or the appropriate progression of the local plan. Therefore, the county council cannot agree to any timeframe for the opening of a new secondary school, due to the uncertainty surrounding the commencement of this development (if approved) and other sites that may come forward within the Tring area. The delivery strategy for Tring remains unclear and there is uncertainty as to the number of dwellings a revised strategy for the settlement may contain.

Therefore, in order to enable flexibility to best serve the Tring area, delivery (whichever strategy that takes) must be unconstrained so that it can be brought forward as and when it is needed and at an appropriate scale and form for any growth coming forward in the town.

As previously stated, this development in isolation does not appear to yield sufficient pupils to make a new secondary school deliverable or sustainable. However, the provision of a serviced secondary school site of a suitable size would allow the county council flexibility for new education provision to be delivered at the appropriate time and in the right form. This will be able to respond to actual demand and any further growth once this has been outlined in the borough council's new local plan.

The expansion of Tring School, with a split-site solution, may be a more appropriate and deliverable option should growth be limited in the town (e.g. major development limited to the East of Tring site alone). However, this would still require additional land (a serviced site) to enable this to be delivered, with some additional cost and space implications arising from the split-site build and the potential need to duplicate some facilities. This would be one option for the land identified within the application.

Alternatively, a higher level of development in the wider area than East of Tring alone may require education provision of the scale that a new standalone school (albeit potentially within a Multi-Academy Trust) would be viable, deliverable and the most appropriate strategy, even were this to be substantially delivered late or even beyond the draft plan period. The county council's preference therefore is to identify and reserve a serviced site capable of delivering a new secondary school for this potential scenario, with no limitations on the type of (education) project it will accommodate or artificial delivery dates. It is considered that this will enable flexibility for new education

provision to be delivered at the appropriate time and in the right form.

Estimated contributions

The modelling of the proposed development has also been used to estimate the level of contributions that HCC wishes to seek:

Primary Education: towards the proposed new primary school site, including nursery provision (£10,917,755, index linked to BCIS 1Q2020).

We therefore consider the following trigger points to be appropriate for inclusion within the Section 106 agreement:

Serviced site transfer: ~155 dwellings

Contributions:

- | | | |
|---|-----|-------------------|
| o | 5% | Upon commencement |
| o | 40% | ~300 dwellings |
| o | 45% | ~600 dwellings |
| o | 10% | ~1,200 dwellings |

It is reasonable that the land costs for the primary school are proportioned to those developments which are being mitigated by it. Approximately 2.4fe originates from this development, which is 120% of a 2fe new primary school. As 120% of the need is arising from this development, it is reasonable to increase the primary education contribution to include 120% of the land costs.

It should be noted that in a number of recent instances, HCC has received land from developers, towards school provision, at nil value as without the facilities provided by a school expansion, the development would not be viable. The most recent example we have of valuing land for educational use is valued at approximately £35,000 per acre (so approximately £86,450 per hectare, £35,000 x 2.47).

Based on a 2fe primary school site of 2.1ha, the value of the land is £181,545 (£86,450 per hectare x 2.1ha). 120% of the costs are £217,854 (£181,545 x 120%).

Therefore, the level of primary education contributions which are sought from the development is £11,099,300 (£10,917,755 + £181,545) (based on costs as of 1Q2020 - BICS All in TPI, indexation to be applied).

Secondary Education: contributions are: £10,289,986 (index linked to BCIS 1Q2020) and includes post 16.

We therefore consider the following trigger points to be appropriate for inclusion within the Section 106 agreement:

Serviced site transfer: ~300 dwellings

Contributions:

- o 5% Upon commencement
- o 30% ~450 dwellings
- o 35% ~750 dwellings
- o 30% ~1,200 dwellings

Monitoring Fees: HCC will charge monitoring fees. These will be based on the number of triggers within each legal agreement with each distinct trigger point attracting a charge of £340 (adjusted for inflation against RPI July 2021). For further information on monitoring fees please see section 5.5 of the Guide to Developer Infrastructure Contributions.

Although estimated contributions have been included in this response, outline applications will require the ability for an applicant to recalculate contributions at the point of a reserved matters application and as such a calculation table will be provided as part of the Section 106 drafting process. This approach provides the certainty of identified contribution figures with the flexibility for an applicant/developer to amend the dwelling mix at a later stage and the financial contribution to be calculated accordingly.

Justification

The above figures have been calculated using the amounts and approach set out within the Guide to Developer Infrastructure Contributions Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County Council's Cabinet 12 July 2021 and is available via the following link: [Planning obligations and developer infrastructure contributions | Hertfordshire County Council](#)

In respect of Regulation 122 of the CIL Regulations 2010 (amended 2019), the planning obligations sought from this proposal are:

- (i) Necessary to make the development acceptable in planning terms. Recognition that contributions should be made to mitigate the impact of development are set out in planning related policy documents. The NPPF states "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations." Conditions cannot be used cover the payment of financial contributions to mitigate the impact of a development The NPPG states "No payment

of money or other consideration can be positively required when granting planning permission." The development plan background supports the provision of planning contributions. The provision of community facilities is a matter that is relevant to planning. The contributions sought will ensure that additional needs brought on by the development are met.

(ii) Directly related to the development.

The occupiers of new residential developments will have an additional impact upon local services. The financial contributions sought towards the above services are based on the size, type and tenure of the individual dwellings comprising this development following consultation with the Service providers and will only be used towards services and facilities serving the locality of the proposed development and therefore, for the benefit of the development's occupants.

(iii) Fairly and reasonably related in scale and kind to the development.

The above financial contributions have been calculated according to the size, type and tenure of each individual dwelling comprising the proposed development (based on the person yield).

The CIL Regulations discourage the use of formulae to calculate contributions. However, the county council is not able to adopt a CIL charge itself. Accordingly, in areas where a CIL charge has not been introduced to date, planning obligations in their restricted form are the only route to address the impact of a development. In instances where a development is not large enough to require on site provision but is enough to generate an impact on a particular service, an evidenced mechanism is needed to form the basis of any planning obligation sought. HCC views the calculations and figures set out within the Guide to Developer Infrastructure Contributions as an appropriate methodology for the obligations sought in this instance.

The county council's methodology provides the certainty of identified contribution figures based on either a known or estimated dwelling mix, the latter of which might be agreed with the local planning authority based on expected types and tenures set out as part of the local plan evidence base. This ensures the contributions are appropriate to the development and thereby meet the third test of Regulation 122 of the Community Infrastructure Levy Regulations 2010 (amended 2019): "fairly and reasonably relates in scale and kind to the development".

Please also note that the Hertfordshire Fire and Rescue Service Water Officer should be consulted directly at water@hertfordshire.gov.uk, who may request the provision of fire

	<p>hydrants through a planning condition.</p> <p>I would be grateful if you would keep me informed about the progress of this application so that either instruction for a planning obligation can be given promptly if your authority is minded granting consent or, in the event of an appeal, information can be submitted in support of the requested financial contributions and provisions.</p> <p>Due to the nature of the application, a number of assumptions have been made within this response and further discussions on the mitigations that have been proposed will be welcomed. Should you require any further information please contact the Growth & Infrastructure Unit.</p>
<p>Health & Safety Executive</p>	<p>HSE is a statutory consultee for certain developments within the consultation distance (CD) of major hazard sites and major accident hazard pipelines, and has provided planning authorities with access to HSEs Planning Advice WebApp https://pa.hsl.gov.uk</p> <p>I should therefore be grateful if you would arrange for HSEs Planning Advice WebApp to be used to consult HSE for advice on this application Should you or your colleagues need any additional help in using the new WebApp to obtain HSE's advice on a proposed development, a central support service is available at lupenquiries@hse.gov.uk or by telephoning on 01298218159.</p> <p>NB On 1 August 2021 HSE became a statutory consultee with regard to building safety (in particular to fire safety aspects) for planning applications that involve a relevant building.</p> <p>A relevant building is defined in the planning guidance at gov.uk as:</p> <ul style="list-style-type: none"> o containing two or more dwellings or educational accommodation and o meeting the height condition of 18m or more in height, or 7 or more storeys <p>There is further information on compliance with the Building Safety Bill at https://www.gov.uk/guidance/fire-safety-and-high-rise-residential-buildings-from-1-august-2021 . HSE's team can be contacted by email via PlanningGatewayOne@hse.gov.uk"</p> <p><u>FURTHER COMMENTS RECEIVED 23.05.22</u></p> <p>Thank you for your email seeking HSE's observations on application 22/01187/MOA.</p> <p>HSE is a statutory consultee for certain developments within the</p>

	<p>consultation distance of major hazard sites and major accident hazard pipelines.</p> <p>However, as the Web App consultation (HSL-220520103452-73 Does Not Cross Any Consultation Zones) states, this application does not fall within any HSE consultation zones. There is therefore no need to consult the HSE Land Use Planning (LUP) team on this planning application and the HSE LUP team has no comment to make.</p> <p>For details of the petroleum pipeline, you will need to contact the pipeline operator.</p>
<p>Hertfordshire Property Services (HCC)</p>	<p>Thank you for consulting us regarding the above-mentioned planning application. The comments within this response reflect the interests of the Minerals & Waste Planning Authority and HCC as Public Health Authority.</p> <p>Minerals and Waste Planning</p> <p>Minerals</p> <p>The site does not fall within the 'Sand and Gravel Belt' as identified in Hertfordshire County Council's Minerals Local Plan 2002 - 2016. The Sand and Gravel Belt is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. It should be noted that British Geological Survey (BGS) data also does not identify any superficial sand/gravel deposits in the area on which the application falls.</p> <p>Adopted Minerals Local Plan Policy 5 (Minerals Policy 5: Mineral Sterilisation) encourages the opportunistic extraction of minerals for use on site prior to non-mineral development. Opportunistic extraction refers to cases where preparation of the site for built development may result in the extraction of suitable material that could be processed and used on site as part of the development.</p> <p>It is considered that there are unlikely to be significant mineral (sand and gravel) deposits within the area in question. On this basis, development may give rise to 'opportunistic' use of some limited or poorer quality minerals at the site that could be utilised in the development itself. Examination of these opportunities would be consistent with the principles of sustainable development.</p> <p>Waste</p> <p>Government policy seeks to ensure that all planning authorities take</p>

responsibility for waste management. This is reflected in the county council's adopted waste planning documents. In particular, the waste planning documents seek to promote the sustainable management of waste in the county and encourages district and borough councils to have regard to the potential for minimising waste generated by development.

The National Planning Policy for Waste (October 2014) sets out the following:

'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- o the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;
- o new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;
- o the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'

This includes encouraging re-use of unavoidable waste where possible and the use of recycled materials where appropriate to the construction. In particular, you are referred to the following policies of the adopted Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document, 2012 which forms part of the Development Plan. The policies that relate to this proposal are set out below:

- o Policy 1: Strategy for the Provision for Waste Management Facilities (this is in relation to the penultimate paragraph of the policy)
- o Policy 2: Waste Prevention and Reduction; &
- o Policy 12: Sustainable Design, Construction and Demolition

Site Waste Management Plan

Waste Policy 12: Sustainable Design, Construction and Demolition requires that all relevant construction projects to be supported by a

Site Waste Management Plan (SWMP). SWMPs aid decisions relating to the management of waste arisings during demolition and construction phases and encourage building materials, made from recycled and secondary aggregate sources, to be used within developments.

The Minerals and Waste Planning Authority is pleased to see that a SWMP has been submitted as part of the application. The pre-construction SWMP submitted is considered adequate and sets out sufficient details the Waste Planning Authority would expect to see included:

- o Section 3 of the SWMP sets out the construction waste management process and Section 4 outlines the waste principles to be undertaken in order to reduce and recover the amount of waste produced by the development.
- o Section 4 also sets out the methodology for estimation of waste arisings as well as providing estimated figures. A detailed breakdown of estimated wastes by material types is also provided to a good level of detail.
- o Section 5 identifies the roles and responsibilities of the project team members in relation to waste management.

SWMPs are live documents which should be updated periodically throughout the duration of a project. Actual waste arisings should be recorded in the SWMP as the project progresses, as well as details of where waste is taken to, identifying waste carriers and waste management facilities.

The SWMP must be available to any contractor carrying out work described in the plan and should be forwarded to the Waste Planning Authority when completed. There is no need to provide monthly progress; instead, the final figures at the completion of the project would be sufficient. These should be sent to the Spatial Planning and Economy Unit at the above postal address or by email to: spatialplanning@hertfordshire.gov.uk

The application site is located within 500m of Tring Sewage Treatment Works, which is a safeguarded waste site Waste Policy 5 of the Waste Core Strategy and Development Management Policies document due to its important contribution to the strategic network of waste management provision in the county. It is considered that the proximity of an existing, operational waste site should be taken into account in the Design and Access Statement submitted with the application.

Consideration should also be given to the 'agent of change' principle,

as outlined in paragraph 187 of the National Planning Policy Framework (July 2021), which states that:

"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

The proposal should therefore take into account the need to mitigate any negative impacts (such as odours) arising from the proximity to the sewage treatment works.

Public Health

Air Quality

Whilst it is accepted that it is better to reduce air pollution at source than mitigate the consequences, every new development will have an impact on air quality, usually by increasing emissions from buildings or from traffic generation. The links between poor air quality, human health, and the environment are well documented and is classed by Public Health England as a major public health risk alongside cancer, heart disease and obesity.

Consideration should be given to Public Health England's 2019 "net health gain" principles which, if adopted, intend to deliver an overall benefit to people's public health. In effect this means that any new development should be clean by design, incorporating interventions into design to reduce emissions, exposure to pollutants and contribute to better air quality management, applicable irrespective of air quality assessments.

In addition, it is advised that the developer should consider sensitive placement of sensitive receptors to air pollution. This includes the allocation of the proposed schools and older persons housing where air pollution is expected to be at its lowest and careful location of any affordable dwelling contribution in areas likely to have low concentrations of air pollutants and noise.

Reassurance is sought that the proposed development will not

contribute to a worsening of local air quality that may lead to poor health outcomes (through exposure) for the existing community living in the vicinity, or for new and vulnerable populations (such as the elderly or young children).

The Planning Authority may wish to consider the National Institute for Health and Care Excellence (NICE) 2017 Guidance on Outdoor Air Pollution, as well as the 2019 Quality Standard (QS181) which covers road-traffic-related air pollution and its impact on health. The Quality Standard describes high-quality actions in priority areas for improvement, with Quality Statement 2 focussed on planning applications.

Creating Access for all

In order to meet the needs of an ageing population and individuals with physical disabilities and limiting illnesses, consideration should be given to the levels of accessibility across the development. This includes footpath surfaces and colour schemes (particularly for people with dementia) and street furniture design (i.e. seating suitable for older adults); and footpath surfaces in SANGs to be level and suitable for wheelchair access; and places to stop and rest throughout the development to make active travel a viable option for local residents who are less physically able. This provision will widen accessibility and contribute towards the objectives set out in the Hertfordshire Local Transport Plan (LTP4) to increase active travel.

Adoption of active travel behaviours from the new occupants

It is recommended that there is appropriate signage for pedestrian/cycle routes towards key local destinations (including the bus and train stations) and rights of way which includes journey times. To encourage the adoption of new active travel behaviours, this needs to be in place prior to first occupation when individuals are more susceptible to change. The planning authority may wish to consider this by way of a condition.

Active Design

The proposal should maximise opportunities for encouraging physical activity by following the guidance in Sport England's and Public Health England's Active Design guidance:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>.

In particular, the checklist in the Active Design guidance should be used for informing the design and consideration of how the checklist has been considered should be included in a planning application e.g. as part of the Health Impact Assessment or Design and Access

Statement.

Provision of healthy, affordable food

The provision of affordable, healthy food choices and a balance in the range of food outlets occupying the retail space is encouraged, in order to enable individuals to make healthy choices, whilst promoting local commercial diversity. The environment in which we live, work and play has a considerable influence on our food choices . Easy access to affordable, healthy food choices can help to support a balanced diet and prevent unhealthy weight in the population . HCC looks to the local planning authority to consider licencing restrictions for food outlets within this development to provide a balance of food choices available.

Affordable Housing

Having a good quality home is important to our health and wellbeing and ensuring accessibility to affordable housing is a priority across the County. Whilst this application is in outline, it is considered to be important that the development provides its affordable housing in a way which is integrated and avoids demarcation. It should also have equal access to any green space provided.

Contributions towards modal shift and active recreation

It is recommended that the planning authority considers seeking contributions through CIL by way of a planning condition towards local schemes to encourage modal shift towards active and sustainable travel.

No provision has been provided as part of this development to encourage active play and it is therefore considered that contributions through CIL are sought, in order to improve local play areas close to the proposed development.

Charging points for electric vehicles

To encourage the use of cleaner vehicles, electric charging points should be provided for all new residential and non-residential buildings with associated parking.

Health Impact Assessment

In November 2019, HCC adopted a Health Impact Assessment (HIA) Position Statement. This sets out when a HIA should be undertaken and frameworks to use for each stage of the HIA process. The Position Statement includes guidance on the quality assurance

framework that will be used to assess HIAs that are submitted with planning applications. The HIA Position Statement and supporting appendices can be downloaded from the following weblink: <https://www.hertfordshire.gov.uk/healthyplaces>.

HCC is pleased to see that a HIA has been included within the application. However, it is noted that the developer used NHS Healthy Urban Development Unit's (HUDU) methodology despite being previously advised to use Wales Health Impact Assessment Support Unit (WHIASU) assessment methodology as set out in the HCC Position Statement. After completing a quality assurance review of the submitted HIA, several areas have been identified where the HIA could be strengthened which the developer needs to address (please refer to Annex 1).

Until the following areas listed in Annex 1 are addressed, HCC cannot be satisfied that these issues have been considered robustly as part of this application.

Annex 1 HIA Report Quality Assurance

- o No attempt has been made to use the Wales Health Impact Assessment Support Unit (WHIASU) HIA methodology as specified in the Herts County Council HIA Position Statement (2019) .
- o Expertise of the assessor has not been stated in the HIA. In order to ensure the completeness and quality of the HIA: (a) the developer must ensure that the HIA is prepared by competent experts; and (b) the HIA must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts.
- o No constraints or limitations in preparing the HIA have been explained.
- o The report does not identify and justify the use of any standards and thresholds used to assess the significance of health impacts.
- o Health inequalities in the distribution of predicted health impacts have not been adequately investigated and the effects of these inequalities has not been stated.
- o Community profile is structured around HUDU methodology. The profile should have also identified the vulnerable population groups, where possible, as well as inequalities in health between different population groups.
- o HIA has not identified vulnerable population groups.
- o Good to see the use of health profile data, as stated above, but it has not established an information base from which requirements for health protection, health improvement and health services can be assessed for the area affected by the development. In addition to PH

	<p>data from health profiles such as physical activity levels, local statistics should represent health, unemployment rates, crime and air quality.</p> <ul style="list-style-type: none"> o The methodology has not attempted to determine the criteria for the significance/adversity of the effects on human health. o The assessment approach through the use of HUDU table at the end of the document is very general under broad headings, it does not provide a comprehensive assessment of the potential health impacts. A high quality HIA would provide a thorough assessment of health impacts. o Inequalities in the distribution of predicted health impacts have not been investigated and the effects of these inequalities has not been stated. <p><u>FURTHER COMMENTS RECEIVED 20.07.22</u></p> <p>Thank you for consulting us on the revised Health Impact Assessment (HIA) that accompanies the above planning application.</p> <p>We have reviewed the HIA and consider it to be an improvement on the original document that previously accompanied the planning application. We therefore have no further comments on it.</p>
<p>Hertfordshire Ecology</p>	<p>Summary</p> <ul style="list-style-type: none"> o This letter only addresses issues relating to the Report to Inform a Habitats Regulations Assessment submitted as part of the application. Further comments relating to other ecological matters, such as biodiversity net gain, and the closely related landscape strategy will be covered in a subsequent letter. o Given the complexity of this case, Herts Ecology's advice is offered on a without prejudice until such time as all issues are understood or resolved; o Fundamentally, the Report to Inform a Habitats Regulations Assessment does not provide the evidence to allow the Council to conclude no adverse effect on the integrity of the Chilterns Beechwoods Special Area of Conservation; o This letter highlights a range of concerns relating to the structure and understanding of, and the levels of scrutiny applied by the Report to Inform a Habitats Regulations Assessment; o Whilst not irretrievable, considerable work is required before it can be considered fit for purpose and so allow the Council to make an informed decision;

o Consequently, I cannot recommend that consent is granted until these issues are resolved;

o Notwithstanding this advice, the Council must take full account of Natural England's advice as it remains the statutory consultee on matters relating to Habitats Regulations Assessment. At the time of writing, it is not known if Natural England shares these or other concerns (or, indeed, is satisfied with the work carried out). If the Council is minded to grant consent against Natural England's advice, it must inform Natural England and allow 21 days for any further representations it may make before consent is granted.

Full response

Thank you for your letter of 13 April 2022 which refers, and for consulting Herts Ecology.

This letter only addresses issues relating to the Report to Inform a Habitats Regulations Assessment (Ecology Solutions, March 2022) submitted as part of the application. This letter subsequently refers to this report as the 'RIHRA' to distinguish it from comments I make relating to the Habitats Regulations Assessment process in general which is referred to as 'HRA'.

Comments relating to other ecological matters, such as biodiversity net gain and the closely related landscape strategy, will be covered in a subsequent letter. This is, in part, driven by the absence of the net gain spreadsheet that underpins the net gain report which hampers my assessment.

The following advice is offered on a 'without prejudice' basis until such time as all the issues described in this letter are understood or resolved. This is because of the complexity and volume of information to review, the emerging strategic mitigation strategy (comprising Strategic Access Management and Mitigation (SAMMs) and Suitable Alternative Natural Greenspaces (SANGs)) being prepared by the Council continues to evolve, and that by law the Council must take full account of Natural England's advice; when the latter becomes available, it may prompt my advice to also evolve.

This response takes the form of a letter, where a number of 'contextual' matters are presented first followed by my conclusion. The majority of my comments are tabulated in Annex 1 for greater ease of reference. These follow the order presented in the RIHRA. Given that the RIHRA adopted an unintuitive structure these may also appear to lack an obvious pattern, but this approach is considered to

be the most straightforward.

HRA, the RIHRA and the Chilterns Beechwoods SAC
Drawing on legislation and case law, the Council (the 'competent authority') 'may agree to the plan or project only after having ascertained [beyond reasonable scientific doubt] that it will not adversely affect the integrity of the European site [though absolute certainty is not required]'.
It is this test that should frame any HRA and so underpins all my advice including the comments in Annex 1. HRAs should employ the precautionary principle, be based on objective information, and provide certainty that adverse effects can be avoided.

It is this test that should frame any HRA and so underpins all my advice including the comments in Annex 1. HRAs should employ the precautionary principle, be based on objective information, and provide certainty that adverse effects can be avoided.

In the majority of cases, HRAs comprise two stages. Firstly, the screening assessment seeks to identify if there are credible risks that the conservation objectives of the site could be undermined, alone or in combination with other plans or projects. Secondly, if likely significant effects cannot be ruled out, the greater scrutiny of an appropriate assessment is required to assess if adverse effects on the integrity of the European site can be ruled out.

In simpler terms, it is for the applicant to provide evidence to show that adverse effects can be avoided, not for the Council to have to prove adverse effects exist. This places a considerable burden of proof on the applicant.

The People Over Wind decision also makes clear that where there is a risk that adverse effects may arise, the merits or otherwise of mitigation may only be considered in the appropriate assessment (and not at the screening stage).

Overall, the RIHRA is disappointing and does not provide the levels of certainty required by the Council to ascertain there will be no adverse effect on the SAC. Problems arise throughout relating to the structure of the RIHRA, the interpretation of the key tests, the (lack of) evidence presented, the lack of reference to Natural England's conservation objectives and supplementary advice, the level of scrutiny applied, and the use of mitigation prior to the appropriate assessment, amongst others.

I accept that recreational pressure represents the primary potential threat to the SAC and risk for the proposed development. This is also clear from the recent visitor survey carried out by Footprint Ecology that has led to Natural England recommending that a moratorium is placed on all net residential growth within a 12.6km Zone of Influence (Zoi) of the SAC as it considered that adverse effects could not be

ruled out without effective mitigation.

Whilst the Council is leading the identification and delivery of strategic mitigation measures to allow development to recommence safely, this application precedes this. This places an additional burden on the project to satisfy the mitigation measures required as Natural England stated in its letter of 14 March 2022 that:

'In essence each application would need to prove that in itself it wouldn't harm the SAC either alone or in combination with all other planning applications in the ZOI.'

The courts and best practice guidance make clear that mitigation should be 'effective, reliable, timely and guaranteed to be delivered'. Consequently, any uncertainty surrounding mitigation means it cannot be relied upon. This sets a high bar that must be achieved. Ideally, it should complement the Council's wider, strategic approach, yet provide evidence it will be effective on its own.

At present, it does not achieve this, and I believe the outcome of the RIHRA, that adverse effects can be avoided, cannot be relied upon.

Whilst this situation is not irretrievable, considerable work is required to make the RIHRA robust and fit for purpose. This should focus on but not be limited to addressing the matters in this letter including Annex 1. Upon revision, I would be happy to review this again.

Conclusion

At present, therefore, I cannot advise that the Council has the evidence to be able to conclude that there will be no adverse effects on the integrity of the SAC. Therefore, the Council should not consent the application until these issues are resolved.

Importantly, though it is the Council that remains the competent authority and it is its decision whether to accept the RIHRA or not. Should Natural England object and the Council is minded to grant consent against Natural England's advice, it must inform Natural England and allow 21 days for any further representations it may make before consent is granted.

FURTHER COMMENTS RECEIVED 09.09.22.

Summary

- o This letter addresses issues relating to the Report to Inform a Habitats Regulations Assessment (RIHRA), including air quality and

Suitable Alternative Natural Greenspace and other ecological matters including species protection and biodiversity net gain. Comments on air quality are not provided here but will be provided as soon as possible;

- o Given the complexity of this case, this advice is offered on a without prejudice until such time as all issues are understood or resolved;
- o This letter highlights a range of concerns relating to the structure and understanding of, and the levels of scrutiny applied by the Report to Inform the Council's Habitats Regulations Assessment;
- o Fundamentally, the RIHRA does not provide the evidence to allow the Council to conclude no adverse effect on the integrity of the Chilterns Beechwoods Special Area of Conservation;
- o Other shortcomings arise in relation to other ecological matters including biodiversity net gain and avoidance/mitigation/compensation measures;
- o Whilst not irretrievable, further work and/or clarification is required before either can be considered fit for purpose and so allow the Council to make an informed decision;
- o Consequently, I cannot recommend that either the RIHRA or other discrete elements of the overall ecological assessment can be accepted or that consent is granted, until these issues are resolved;
- o Notwithstanding this advice, the Council must take full account of Natural England's (NE) advice as it remains the statutory consultee on matters relating to Habitats Regulations Assessment. It is noted that NE shares some of the concerns described below, if not all; and
- o If the Council is minded to grant consent against NEs advice, it must inform NE and allow 21 days for any further representations it may make before consent is granted. However, recent case law (Wyatt) makes clear that the Council remains the principal regulator though any disagreement with NEs advice should be accompanied by cogent reasoning.

Full response

Thank you for your original consultation of 13 April 2022 and the subsequent provision of other, related documents which refer. Previous to this letter, I provided comprehensive advice by letter of 24 May 2022. That letter only addressed issues relating to the Report to Inform a Habitats Regulations Assessment (or RIHRA) (Ecology Solutions, March 2022).

For the avoidance of doubt, this letter refers to this report as the 'RIHRA' to distinguish it from comments I make relating to the Habitats Regulations Assessment process in general which is referred to as 'HRA'.

This letter goes on to provide comment on the updated RIHRA (Ecology Solutions, August 2022), the Draft SANG Management Plan (Ecology Solutions, July 2022), the Biodiversity Net Gain Assessment - Rev A (Ecology Solutions, March 2022) amongst others. Comments on the Air Quality Note (Air Quality Consultants July 2022) and related elements of the RIHRA are deferred to a later date but will be provided as soon as possible.

Discrete topics are taken in turn.

RIHRA - general

Amongst other issues, the original RIHRA displayed structural problems that made interpretation unnecessarily difficult and conflicted with case law, meaning its outcomes should not be relied upon by the Council.

I made many suggestions to address these issues. Although some have been adopted, it is disappointing that so many have not. The overall structure is still far from intuitive and in places still relies on outdated guidance.

Fundamentally, it fails to methodically assess the project against the conservation objectives of the site and, in particular, the targets set out in the supplementary advice. Similarly, there is no apparent consideration of the test of 'reasonable scientific doubt' or the impact on 'typical species'.

Case law is clear that appropriate assessments must provide definitive outcomes based on precise analysis, evaluation and decisions. In its current format, it fails to achieve this. For instance, reliance on a 'check'-list' from English Nature of 2004 is not adequate.

Consequently, the Council cannot rely on the RIHRA to ascertain that adverse effects on the integrity of the Chilterns Beechwoods SAC will not arise.

RIHRA and Suitable Alternative Natural Greenspace (SANG)

Bearing in mind the shortcomings of the assessment process in the RIHRA, and by making reasonable assumptions and by comparing the RIHRAs outcomes with the supplementary advice, I am more satisfied that the SANG proposed has the potential to meet the conservation objectives for the site.

However, much is made of the ability of the SANG to draw in visitors from beyond the proposed new dwellings given, for example, the provision of a café. This will have the effect of bringing new visitors to

the site and could challenge the ability of the proposed SANG to deliver 8ha of open space per 1,000 residents (or as well in this case other users or visitors). I could find no assessment of this risk which must be addressed.

In addition, I could find no definitive statement that management of the SANG will be secured in perpetuity. Similarly, I could not find confirmation that the management body has been confirmed. Management of the SANG would benefit from better integration with wider avoidance, mitigation and compensation measures alongside those for biodiversity net gain.

Consequently, the Council cannot rely on the RIHRA to ascertain that adverse effects on the integrity of the Chilterns Beechwoods SAC will not arise.

RIHRA and Strategic Access, Management and Monitoring (SAMM)

I acknowledge that the applicant intends to make the necessary financial contribution to the strategic SAMMs package. This is welcomed but as the scheme has yet to be finalised, this cannot be relied upon.

Consequently, the Council cannot rely on the RIHRA to ascertain that adverse effects on the integrity of the Chilterns Beechwoods SAC will not arise. However, agreement of the SAMMs package by the Council would remove this constraint.

RIHRA - Role of NE

The Council must take account of NEs advice regarding the RIHRA but recent case law makes clear that the Council remains the principal regulator. However, any disagreement with Natural England's advice should be accompanied by cogent reasoning.

Protected species and landscapes

Other ecological matters appear to be addressed in the Environmental Statement and the description of discrete parcels within the site. Whilst I accept that the site is unlikely to support notable ecological interest, I found the assessment to verge on the superficial and mitigation measures limited and poorly defined; reliance on hedgehog gateways and bird/bat boxes is not adequate for a development of this scale.

For instance, the opportunities and constraints provided by the orchard to the north should play a greater role in the

design/assessment of biodiversity, landscape and access provision. I agree the lighting strategy will be an essential component of wider measures though can accept that this can be secured by condition or similar, as suggested.

Even making allowance for its hybrid planning status, it is clear that the status of protected species should be established prior to any consent. I note the identification of several trees with potential for supporting bat roosts but no further assessment appears to have been made though it is not clear if these are to be affected by the proposals or not; clarification is required. Similarly, I understand several buildings are to be demolished though it is not clear if this is to be part of this application or not. If so, I would have expected to see preliminary roost assessments at the least. Again, clarification would be appreciated.

There is a relationship between the mitigation discussed above and the Landscape and Biodiversity Management Strategy (LBMP) (March 2022). I am satisfied that the illustrative proposals identify the potential to deliver a landscaping scheme of benefit to biodiversity but the detail provided is modest and seems to focus on how it can be created rather than what will arise. However, I anticipate this will evolve alongside the application, the provision of SANG and net gain and will require much closer attention to detail.

Overall, clarification is required regarding the status and mitigation of protected species, and the integration of these proposals with net gain and SANGs (see below).

Biodiversity net gain

I acknowledge the indication that a biodiversity net gain (BNG) BNG of 39.76% in habitat units and 0.42% hedgerows. I note, importantly and correctly, that this excludes land identified as SANG.

However, to allow full and proper scrutiny of the BNG proposals, submission of the underpinning spreadsheet is required. Until such time as it is, the outcomes of the BNG report cannot be relied upon. I am aware that the Herts and Middlesex Wildlife Trust requested this same information months ago and it is disappointing it has not been provided so far.

SANG/LBMP/BNG/species mitigation

To help, in part, address the issues above I would like to see better integration of SANG, LBMP, BNG and species mitigation proposals by means of maps and reports.

FURTHER COMMENTS RECEIVED 27.09.22

Further to the recent provision of the main and 'mini' biodiversity net gain metrics and other contributions by the Herts & Middlesex Wildlife Trust (the Trust) and Natural England (NE), I offer the comments below. I also draw on various emails and requests from your emails over the last few days. In doing so, I aim to clear up any uncertainties and 'loose ends' and so cover various topics. Each is dealt with separately.

Biodiversity net gain

I had previously expressed concerns regarding the provision of a biodiversity net gain.

Consequently, provision of the main and 'mini' metrics is welcomed though given the limited time before the Committee meeting and mindful of a first request made by the Trust in May 2022, the late delivery of this is unhelpful. Consequently, only limited scrutiny has been possible.

That said, Herts Ecology has worked collaboratively with the Trust over this matter and I have seen its comments provided on 26 September. I endorse those comments which will require some amendments to the proposals.

Further, I accept the relationship between the two spreadsheets and the provision of Suitable Alternative Natural Greenspace (SANG) (see below), and that the potential for conflict can now be seen to be avoided when considered with other documents and plans etc.

I will stress the importance of the Biodiversity Net Gain Management Plan (BNGMP) as the tool to deliver the necessary outcomes as this outline application evolves. This will require careful preparation and consultation with adequate time for comment. The need for the BNGMP should be secured by condition or planning agreement as appropriate.

I will also add though that it is Herts Ecology's position that whilst a 10% is not yet mandatory, it is something that should certainly be aimed for with a development of this scale.

Furthermore, I wish to see careful consideration (especially) of the northernmost orchard. This has significant value, ecological and cultural, and would benefit from careful consideration in the BNGMP (and SANG) proposals as they evolve.

Given my views above, matters surrounding biodiversity net gain need not represent a reason for objection providing the actions recommended by the Trust are secured/carried out.

Protected species

I acknowledge that the building proposed for demolition have negligible potential to support roosting bats and no further consideration of this specific matter is required.

I also acknowledge that trees that have been identified as having the potential to support roosts will not be directly affected either by felling or pruning. Consequently, there is no need for bat surveys to be carried out prior to any consent.

However, it is clear that the latter could be affected by current proposals for street and sports pitch lighting. It is imperative, therefore, that the suggested lighting strategy takes full account not only of the trees but all associated commuting and foraging areas to ensure that the continued functionality of these roosts (assuming bats are present) across the application site, and that connections with the wider countryside are maintained beyond. This advice may be amended subject to further, more detailed study of the trees in question, should this be considered necessary.

In addition, the BNGMP should also ensure that existing and potential foraging areas are managed to improve their ability to perform this function in the future.

Consequently, providing the need for a lighting strategy and BNGMP are secured, this issue need not represent an objection.

Local Wildlife Sites

I agree that there will be no direct impact on the two Local Wildlife Sites (LWS) nearby: the Grand Union Canal (Bulbourne to Tring Station) and Station Road/Grove Road Fields. I also agree that the provision of SANG and other open space will reduce the risk of harmful recreational pressure.

In stating this, I am aware that the Grand Union Canal etc LWS lies a considerable distance and is separated from the proposed built development by an area of SANG. In contrast, the Station Road/Grove Road Fields LWS lies much closer. However, the presence of a hedgerow provides a physical barrier and this sits within a separate area of 'open space'. Whilst not of the form or function as

SANG it is anticipated to perform a similar and adequate ameliorating role.

I acknowledge this remains an outline application which will evolve. However, it is imperative that the SANG/open space referred to above is retained in future iterations and, in the case of the Station Road/Grove Road Fields LWS, the BNGMP should seek to strengthen boundary features and ensure the ability of the open space to retain users/visitors is at the least maintained.

In addition, the suggested lighting strategy should not only be secured by planning agreement or condition, but should, amongst other objectives, ensure the absence of light spill into either LWS. Providing the need for a lighting strategy and BNGMP are secured, this issue need not represent an objection.

Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)

Whilst the proposals appear to meet the numerical requirements of, and satisfy the broad principles of SANG, my concerns remain. As a minimum, the SANG should be open and functioning on first occupation, with a circular route and interpretation provided. Furthermore, a suitable management body must be secured in perpetuity to meet expectations and provide the necessary confidence that the scheme can be delivered, and that adverse effects on the integrity of the Chilterns Beechwoods SAC can be avoided, beyond reasonable scientific doubt. Without this certainty, consent should not be given.

In terms of SAMM, I note the apparent intention of the applicant to subscribe to the Council's emerging, Borough-wide SAMM strategy but as this has not yet been finalised, this cannot be guaranteed. As the SAMM represents a fundamental component of the mitigation of potentially adverse effects, consent should not be granted until this has been secured. Once the contributions are known and the applicant's willingness confirmed and secured, this constraint would be removed and consent could be awarded.

Habitats Regulations Assessment (HRA)

To clarify comments made by me by email recently. I had raised concerns regarding the structure of the report, the use of mitigation at an incorrect stage in the process and the level of scrutiny applied, specifically in relation to the use of the supplementary advice.

Noting that the authors (Ecology Solutions) amended the structure to

	<p>address concerns regarding the use of mitigation, my view remains that they could still have made the HRA (or RIHRA, for the avoidance of doubt) far clearer. This would have had the benefit of making the level of scrutiny claimed to be more justifiable and provided greater confidence that adverse effects on the integrity of the SAC could be ruled out.</p> <p>That said, if favourable assumptions are made in its benefit, then I believe the approach adopted an analysis carried out can be justified for. Ultimately, however, the acceptability of the RIHRA is dependent on two outstanding, fundamental concerns remain as described above: SANGs and SAMMs.</p> <p>Until these matters are resolved, adverse effects on the integrity of the Chilterns Beechwoods SAC cannot be ruled out, alone or in combination with other plans or projects, and consent must not be granted.</p> <p>When considering your decision, you should take note of the following: Regulation 63(3) of the Habitats Regulations 2017 as amended states: 'The competent authority [ie the Council] must ... consult the appropriate nature conservation body [ie Natural England] and have regard to any representations made by that body ...'.</p> <p>Although recent case law makes clear that it is the competent authority which has the final say, I recommend it would be wise to follow Natural England's advice.</p> <p>Given these circumstances, I recommend that your decision regarding SANGs and SAMMs should await and be guided by Natural England's formal response.</p> <p>I hope these comments are helpful.</p>
<p>Fire Hydrants (HCC)</p>	<p>A condition will be required for the provision and installation of fire hydrants, at no cost to the County Council, or Fire and Rescue Service.</p> <p>This is to ensure all proposed dwellings, employment, educational and community facilities have adequate water supplies available for use in the event of an emergency.</p>
<p>Hertfordshire Fire & Rescue (HCC)</p>	<p>Dear Sir/Madam,</p> <p>22/01187/MOA Land East of Tring</p> <p>Herts Fire & Rescue were consulted on the above Planning</p>

Application. Given the large scale and complexity of the proposed development, please find below an outline of our requirements in regards to firefighter access.

ACCESS ROADS

Access roads may be public highways, private roads, footpaths or specially strengthened and defined routes through the land surrounding the buildings. The recommendations for a pumping appliance and an aerial ladder platform (ALP) are as follows:

GATE OR BARRIERS

Where it is proposed to provide an electronic gate/barrier to prevent unauthorised access to a site, then provisions must be made to allow a fire appliance access to the site in order that the requirements of The Building Regulations Approved Document B5 are complied with. The Fire Authority should be consulted at an early stage on acceptable access controls or alternative solutions.
administration.cfs@hertfordshire.gov.uk

TURNING AND SWEEP CIRCLES OF APPLIANCES

When providing access for appliances, allowance should be made for an appliance's turning circle and sweep circles. Additional turning spaces should be provided where corners have to be negotiated, and sweep circles should not be obstructed above kerb height.

DEAD END ACCESS

Turning facilities should be provided in any dead end access route that is more than 20 m long (See Diagram below.) This can be a hammerhead or turning circle and should ensure that the maximum number of movements is a 3 point turn.

SWEEP AND TURN CIRCLES - APPLIANCES

Maximum length.....8.1m
Maximum height.....3.3 m
Maximum width.....2.9m including mirrors
Maximum weight.....19.0 tonnes
Ground clearance.....220mm

Not to scale

Width of roadway..... 3.7m
Turning circle.....16m

	<p>Sweep circle.....18m</p> <p>Hertfordshire Fire Appliance</p> <p>Length: 8 metres Width: (with doors open) 4.3 Metres, Height 3.7 metres Weight: 19 Tonnes</p> <p>Hertfordshire Fire Appliances (ALP)</p> <p>Length: 10 metres Weight: 26 Tonnes Width: 3.0 metres, Height 4 metres</p> <p>ACCESS FOR BUILDINGS NOT FITTED WITH FIRE MAINS</p> <p>The access requirements for fire service vehicles and personnel are different for non-residential and residential buildings (houses, maisonettes, flats), and increases with the building size and height.</p> <p>For single family dwelling houses, block of flats or maisonettes there should be vehicle access for a pumping appliance to within 45 m of all points within the dwelling house.</p> <p>Where sprinklers in accordance with BS 9251:2014 or BS EN 12845 are fitted throughout a house or block of flats:</p> <ul style="list-style-type: none"> . the distance between the fire appliance and any point within the house (houses having no floor more than 4.5 m above ground level) may be up to 90 m; . the distance between the fire and rescue service pumping appliance and any point within the house or flat may be up to 75 m (in houses or flats having one floor more than 4.5 m above ground level). <p>WATER SUPPLIES</p> <p>For enquires relating to hydrant matters within the Hertfordshire area, you should contact the Water Officer on 01992 507521. Correspondence can be sent to: The Water Officer, Hertfordshire Fire & Rescue Services Headquarters, Old London Road, Hertford, Hertfordshire SG13 7LD.</p>
<p>Hertfordshire Gardens Trust</p>	<p>The site of the proposed development abuts the Chilterns AONB, is in the Green Belt and would cause harm to the setting of the Locally Listed Pendley Manor Historic Park. Sufficient justification for development on the Green Belt has not been made and is thus contrary both to the national NPPF policies and DBC current policies.</p>

	<p>Tring Park and Ashridge Park both suffer from public use with degradation of footpaths and other areas due to high usage. This would increase with the 1400 dwellings proposed. The development would also affect the historic designed long views from Ashridge at Duncombe and Aldbury Terraces, towards Tring, which have recently been the subject of a listing application to Historic England. The effect on Ashridge, Tring Park and Pendley Manor landscapes is contrary to NPPF and DBC Heritage policies.</p> <p>The site is not included in the current DBC site allocations (adopted 2017) and would not be suitable for the reasons given above. We thus object to this proposal.</p>
<p>Herts & Middlesex Badger Group</p>	<p>Isn't this a part of the local plan that we consulted on previously? I am only asking as I didn't think the new local plan had gone to examination hearings yet and/or been approved? I do believe this is the site that we objected to within the local plan due to the huge amount of bio diversity and badgers on the eastern side along the canal. I look forward to hearing from you.</p>
<p>Crime Prevention Design Advisor</p>	<p>Thank you for sight of planning application Reference: 22/01187/MOA, Hybrid application (with access details of two main access points from Bulbourne Road and Station Road in Full and the main development on the rest of the site in Outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 Use Class C2 dwellings)</p> <p>At this early stage of the application I will not respond with a detailed reply however I would ask that security is considered and the development is built to the police security standard Secured by Design.</p>
<p>Highways England</p>	<p>Referring to the consultation on a planning application dated 13 April 2022 referenced above, in the vicinity of the M1 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:</p> <ul style="list-style-type: none"> a) offer no objection (see reasons at Annex A); b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A - National Highways recommended Planning Conditions & reasons); c) recommend that planning permission not be granted for a specified period (see reasons at Annex A); d) recommend that the application be refused (see reasons at Annex A) <p>National Highways Planning Response (NHPR 21-09) September</p>

2021

Highways Act 1980 Section 175B is/is not relevant to this application.1

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Our formal response to this application requires review of the Transport Assessment that is currently being undertaken. For this reason, we require additional time to fully assess the proposed development. We therefore recommend the application be not determined before 18th May 2021. If we are in a position to respond earlier than this, we will withdraw this recommendation accordingly.
Council's Reference: 22/01187/MOA

Location: Land East Of Tring

Proposal: Hybrid application (with access details of two main access points from Bulbourne Road and Station Road in Full and the main development on the rest of the site in Outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 Use Class C2 dwellings); a new local centre and sports/community hub; primary school; secondary school; and public open spaces including creation of a SANG.

Referring to the consultation on a planning application dated 13 April

	<p>2022 referenced above, in the vicinity of the M1 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:</p> <ul style="list-style-type: none"> a) offer no objection (see reasons at Annex A); b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A - National Highways recommended Planning Conditions & reasons); c) recommend that planning permission not be granted for a specified period (see reasons at Annex A); d) recommend that the application be refused (see reasons at Annex A) <p>Highways Act 1980 Section 175B is/is not relevant to this application.¹ This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.</p> <p>Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.</p>
<p>Lead Local Flood Authority (HCC)</p>	<p>Due to current on-going recruitment challenges in the Lead Local Flood Authority, we are needing to prioritise our work and we are unable to respond to any new planning consultations.</p> <p>Advice on what the LLFA expect to be contained within a Flood Risk Assessment / Surface Water Drainage Strategy to support a planning application is available on our surface water drainage webpages. The LLFAs policies on SuDS are contained within the Local Flood Risk Management Strategy 2 (LFRMS2). The Guidance for developers contains a Developers Guide and Checklist for developers to understand LLFA requirements. A climate change allowance note for Hertfordshire is also detailed. These are all available under Policies and Guidance on our website: https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx#</p> <p>If your email is submitting additional drainage / flood risk information in support of an existing planning application that we are already engaged with, please submit this to the LPA so that we can be re-consulted and provide our formal comments when we are able. Please note, it may take time for us to respond to the LPA.</p>

	<p>We are unable to take on any new work except in the most exceptional of circumstances so for most planning applications will be unable to provide any comments.</p> <p>If it is another specific query, we will respond as soon as we can, but there may be delays in our ability to respond due to significantly increased workload alongside severe staffing shortages.</p> <p>Apologies for any inconvenience and thank you for your understanding.</p>
<p>National Air Traffic Services</p>	<p>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.</p> <p>However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.</p> <p>If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.</p>
<p>Natural England</p>	<p>Thank you for your consultation on the above dated and received by Natural England on 13 April 2022.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>SUMMARY OF NATURAL ENGLAND'S ADVICE</p> <p>FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON CHILTERN'S BEECHWOODS SPECIAL AREA OF CONSERVATION (SAC)</p> <p>As submitted, the application could have potential significant effects</p>

on Chilterns Beechwoods Special Area of Conservation (SAC). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- o Appropriate Assessment
- o SANG Management Plan
- o Bespoke SAMM package

Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained. Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Chilterns Beechwoods Special Area of Conservation

Footprint Ecology carried out research in 2021 on the impacts of recreational and urban growth at Chilterns Beechwoods Special Area of Conservation (SAC), in particular Ashridge Commons and Woods Site of Special Scientific Interest (SSSI). Due to this new evidence, Natural England recognises that new housing within 12.6km of the internationally designated Chilterns Beechwoods SAC can be expected to result in an increase in recreation pressure.

The 12.6km zone proposed within the evidence base carried out by Footprint Ecology represents the core area around Ashridge Commons and Woods SSSI where increases in the number of residential properties will require Habitats Regulations Assessment. Mitigation measures will be necessary to rule out adverse effects on the integrity of the SAC from the cumulative impacts of development.

In addition Footprint Ecology identified that an exclusion zone of within 500m of the SAC boundary was necessary as evidence indicates that mitigation measures are unlikely to protect the integrity of the SAC.

Impacts to the SAC as a result of increasing recreation pressure are varied and have long been a concern. The report identified several ways in which public access and disturbance can have an impact upon the conservation interest of the site, these included:

- o Damage: encompassing trampling and vegetation wear, soil compaction and erosion;
- o Contamination: including nutrient enrichment (e.g. dog fouling), litter, invasive species;
- o Fire: increased incidence and risk of fire; and

o Other: all other impacts, including harvesting and activities associated with site management.

In light of the new evidence relating to the recreation impact zone of influence, planning authorities must apply the requirements of Regulation 61 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, to housing development within 12.6km of the SAC boundary. The authority must decide whether a particular proposal, alone or in combination with other plans or projects, would be likely to have a significant effect on the SAC.

Natural England are working alongside all the involved parties in order to achieve a Strategic Solution that brings benefits to both the SAC and the local area to deliver high quality mitigation. Once the strategy has been formalised all net new dwellings within the 500m - 12.6km zone of influence will be expected to pay financial contributions towards the formal strategy.

Habitats Regulations Assessment

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

The assessment undertaken by Ecology Solutions concludes that "the proposals would not be likely to have a significant effect on Chilterns Beechwoods SAC, either considered alone or in combination with other plans or projects." This conclusion has been drawn having regard for the measures built into the proposal that seek to avoid all potential impacts.

On the basis of information provided, Natural England's advice is that this proposed development may contain (or require) measures intended to avoid or reduce the likely harmful effects on a European site(s) which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the People Over Wind ruling by the Court of Justice of the European Union).

It is unclear, from Natural England's point of view, at which stage of the HRA these mitigation measures have been considered, as mitigation should not be considered at the screening stage. These measures therefore need to be formally checked and confirmed by your Authority, as the competent authority, in accordance with the

Conservation of Habitats and Species Regulations 2017 (as amended).

Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM)

As part of Natural England's Discretionary Advice Service, we have provided Ecology Solutions with advice on Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM), as it is likely that both will be required as mitigation for the Chilterns Beechwoods SAC Strategic Solution.

There is a good provision of SANG on-site, and we welcome that the Footprint Ecology standard for calculating SANG capacity of 8ha per 1,000 residents has been met, with 27ha proposed. We note that there is commitment that funding for the management of SANG will be provided in perpetuity and this will be secured through a legal mechanism, which is welcome. The areas south of Marshcroft Lane have mature boundary edges, which are a positive for screening housing, and Ecology Solutions have agreed that the screening north of Marshcroft Lane will be improved. A 2.5km network of circular walks is being created within the site, with links also being created to existing footpaths outside. Other welcome additions to the SANG proposals include the provision of a café, car park, and fencing to make the site secure.

We are therefore happy in principle with the SANG element of the mitigation for this scheme, however, we require further information on how the management of the SANG will take place. We advise that a SANG Management Plan should be provided with accurate costings for expenditure on management of the SANG.

Natural England welcomes Ecology Solution's offer to make a SAMM contribution. Although we understand a first draft of the SAMM Project is forthcoming, there are no details regarding the measures proposed with the Strategic SAMM project at the moment. Our current advice to the applicant has been that we are more than happy to consider a bespoke SAMM package, in consultation with the National Trust. Again, there are currently no details regarding what this may look like, other than a potential financial value per dwelling. Without that certainty of what the contribution for mitigation would go towards, and in lieu of seeing a formal Appropriate Assessment, as it currently stands, we are not in a position to agree that a SAMM contribution will mitigate for this development, pending further information.

It is Natural England's view, as it stands, that the planning authority will not be able to ascertain that this proposed development, would not adversely affect the integrity of the SAC. In combination with other

plans and projects, the development would be likely to contribute to a deterioration of the quality of the habitat by reason of increased access to the site, including access for general recreation and dog-walking. There being alternative solutions to the proposal and there being no imperative reasons of overriding public interest to allow the proposal, despite a negative assessment, the proposal will not pass the tests of Regulation 62.

Biodiversity Net Gain

Natural England advises that SANG is not to be included as Biodiversity Net Gain (BNG), but measures in addition to the creation of SANG can be. We therefore note and welcome that the development will result in a 39.76% increase in habitat units and a 0.42% increase in hedgerow units.

We advise that the approach taken to calculate BNG for this development sounds sensible, as a calculation which looks solely at the SANG has been used to produce a final figure of BNG for the entire development site.

Chilterns Area of Outstanding Natural Beauty

The proposed development is for a site within or close to a nationally designated landscape namely Chilterns Area of Outstanding Natural Beauty (AONB). Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraphs 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Other advice

The proposed development is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB). Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. An assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant development plan policies.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issue of the designation order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight as a material consideration in planning decisions.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact me at 07425 617458 or by email ryan.rees@naturalengland.org.uk.

Should the proposal change, please consult us again.

Annex A - Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Landscape Institute Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in GOV.UK guidance Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on Gov.uk website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced standing advice to help planning

authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here . Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you

to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- o Providing a new footpath through the new development to link into existing rights of way.
- o Restoring a neglected hedgerow.
- o Creating a new pond as an attractive feature on the site.
- o Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- o Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- o Incorporating swift boxes or bat boxes into the design of new buildings.
- o Designing lighting to encourage wildlife.
- o Adding a green roof to new buildings.

Natural England's Biodiversity Metric 3.1 may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the Small Sites Metric may be used. This is a simplified version of Biodiversity Metric 3.1 and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- o Links to existing greenspace and/or opportunities to enhance and improve access.
- o Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- o Planting additional street trees.
- o Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- o Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature

and to avoid and minimise any negative impacts. It is designed to work alongside Biodiversity Metric 3.1 and is available as a beta test version.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a duty to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

FURTHER COMMENTS RECEIVED 16.08.22

Thank you for your consultation on the above dated and received by Natural England on 14 July 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON CHILTERN'S BEECHWOODS SPECIAL AREA OF CONSERVATION

As submitted, the application could have potential significant effects on Chilterns Beechwoods Special Area of Conservation (SAC). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- o In perpetuity management of the SANG

Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Natural England has previously provided detailed comments on this application in our response letter dated 27 May 2022 (our ref: 390238). Therefore, our advice on other issues we have raised should be considered alongside that which are outlined below.

Additional Information required

Natural England welcomes the production of a SANG Management Plan in order to provide detail on how the management of the SANG will take place, including maintenance and management of the habitats within the SANG as well as visitor infrastructure.

We note that section 12 outlines that Harrow Estates will have responsibility for implementation of the management plan, which includes "identifying a suitable body to take on stewardship and future management of the SANG. This could include the Local Planning Authority, a Wildlife Trust, a Management Company, or other suitable body." We advise that future management of the SANG should be conducted "in perpetuity", and the wording should be changed to recognise this requirement. In addition, Natural England requires further information on the work that has taken place to identify a suitable body to manage the SANG.

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 281 (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

Further general advice on the protected species and other natural environment issues is provided at Annex A.

If you have any queries relating to the advice in this letter please contact me on 07425 617458 or by email ryan.rees@naturalengland.org.uk.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our Discretionary Advice Service.

Please consult us again once the information requested above, has been provided.

FURTHER COMMENTS RECEIVED 02.09.22

NATURAL ENGLAND'S ADVICE

OBJECTION - FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES - DEVELOPMENT WITHIN 12.6 KILOMETRES OF CHILTERN'S BEECHWOODS SPECIAL AREA OF CONSERVATION (SAC)

Between 500 metres to 12.6km from Chilterns Beechwoods SAC, mitigation measures will be necessary to rule out adverse effects on integrity.

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. Please re-consult Natural England once this information has been obtained.

Natural England has previously commented on this planning application in our letters dated 27 May 2022 (our ref: 390238) and 11 August 2022 (our ref: 400616). We advise that these responses are considered alongside our comments here.

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

We note that the HRA concludes that there will not be any adverse effects on the integrity of any European sites either alone or in combination with other plans or projects, in light of avoidance and mitigation measures. However, Natural England is currently not in a position to agree with the conclusions of the HRA as yet, as the

	<p>mitigation strategy for the Chilterns Beechwoods SAC has yet to be finalised and agreed.</p> <p>We are happy in principle with the SANG element of the mitigation for this scheme, although further information on the work that has taken place to identify a suitable body to manage the SANG in perpetuity is required. But the SAMM package is still outstanding for agreement by the affected planning authorities, and therefore we have to retain an objection to this application.</p> <p>Consequently, it is Natural England's view that the planning authority will not be able to ascertain that this proposed development, as it is currently submitted, would not adversely affect the integrity of the SAC.</p> <p>Natural England would like to note that as soon as there is certainty around the SAMM package, we will be able to remove our objection.</p> <p>Should the proposal change, please consult us again.</p> <p>If you have any queries relating to the advice in this letter please contact me on 07425 617458 or by email ryan.rees@naturalengland.org.uk.</p>
<p>Herts Valleys CCG</p>	<p>Thank you for consulting with Herts Valleys CCG on this major planning application. We have discussed various aspects of this proposal during our meeting and the subsequent email correspondence and this is our formal response.</p> <p>This development of 1,400 dwellings would result in approximately 3,360 additional residents.</p> <p>Due to its proximity, it will mainly impact on the Rothschild House Group Practice (RHG) and their branch surgery in Tring town centre. Rothschild House itself is already operating in cramped conditions and their ability to absorb any increase in patient population is limited. There appears to be some capacity at the branch surgery, however, this would be minimal in comparison to the need that will be created by this development.</p> <p>In addition to this, there are significant changes taking place within the NHS in the way the healthcare is being delivered, which puts more pressure on GP practices.</p> <p>For some time, the Herts Valleys CCG has been commissioning a number of services from the general practice in addition to their "core" activity. This aspect of the general practice work is now increasing substantially. Namely, the NHS Long Term Plan set out a requirement</p>

for practices to form Primary Care Networks (PCNs). NHS England has agreed an Enhanced Service to support the formation of PCNs, additional workforce and service delivery models for the next 5 years and CCGs were required to approve all PCNs within their geographical boundary by 30 June 2019.

In Herts Valleys CCG there are now 16 PCNs across the 4 localities; each covering a population of between circa 30,000 and 76,000 patients.

These PCNs are expected to deliver services at scale for its registered population whilst working collaboratively with acute, community, voluntary and social care services in order to ensure an integrated approach to patient care.

This means increasing pressure and demand on local GP practices as more services are being brought out of hospitals into the community. The capacity that may be there now, is likely to be taken up by additional services that practices are required to deliver.

For this reason a contribution would be sought from the developer to make this scheme favourable to the NHS services commissioner and we would like to propose that a charge is applied per dwelling towards providing additional primary care capacity in the vicinity, potentially towards an on-site health facility.

Early discussions have taken place with the RHG practice and they are very much interested in exploring potential options associated with this development.

Provisionally, circa 1,000m² and 20 consulting room facility is proposed. At this stage, we are not in a position to confirm whether this will be the optimal size and considerable amount of work is required in order to determine the actual need.

We understand that circa 80 car parking spaces are proposed, which seems rather disproportionate. Current parking policy stipulates 3 per consulting room and we believe that this should be reduced further due to this development seeking to reduce environmental impact and increase biodiversity. There is a free shuttle bus service proposed and this should reduce the parking requirement significantly.

In terms of monetary contribution that we would like to request towards primary care, this is calculated as follows:

1,400 dwellings x 2.4= 3,360 new patients
 $3,360 / 2,000 = 1.68$ GP (based on ratio of 2,000 patients per 1 GP

	<p>and 199m² as set out in the NHS England "Premises Principles of Best Practice Part 1 Procurement & Development")</p> <p>1.68 x 199m² = 334.32 m² additional space required</p> <p>334.32 x £5,410 (build costs including land, fit out and fees) = £1,808,671.20</p> <p>£1,808,671.20 / 1,400 = £1,291.91 ~ £1,290 per dwelling</p> <p>The formula is based on the number of units proposed and therefore related in scale, not taking into account any existing deficiencies or shortfalls.</p> <p>If an on-site facility is preferred, the above contribution could be used to offset the overall costs, thus reducing either capital or revenue impact on the NHS, depending on the procurement route chosen.</p> <p>I trust this will enable you to proceed, however, should you have any questions, please do not hesitate to contact me.</p> <p>Please note that I have passed your consultation email on to our colleagues at the hospital, ambulance, community and mental health services and you will hear from them under a separate cover.</p>
<p>The National Trust</p>	<p>The National Trust supports the delivery of new development through a plan-led approach. It is acknowledged that the site is included within the emerging growth strategy set out in the draft Dacorum Local Plan (Reg.18), but note that further work is being undertaken in respect of the draft plan and that it has not yet been submitted for examination.</p> <p>Our main concern is with regard to the additional recreational pressure that the development will put on the European designated Chilterns Beechwoods Special Area of Conservation (SAC) at the Ashridge Estate, which is owned and managed by the National Trust. We are seeing considerable signs of damage to the SAC from recreational pressure, particularly from trampling, and this is causing damage to notified features. This has the potential to undermine the conservation objectives of the site.</p> <p>As you will be aware, Natural England issued a letter to your authority (dated 14th March 2022) to alert you to evidence (prepared by Footprint Ecology to inform the Habitats Regulations Assessment of the emerging Local Plan) which identifies significant pressure on Chilterns Beechwoods Special Area of Conservation (SAC) and Ashridge Commons and Woods Site of Special Scientific Interest (SSSI). The proposed site falls within the Zone of Influence (ZOI) identified in the Footprint Ecology report where likely significant effects on the SAC from net increases in development due to recreational impacts cannot be ruled out. Accordingly Natural England advise that</p>

	<p>adequate mitigation measures to avoid additional recreational impacts from net increases in development will be needed, in order for the Appropriate Assessment (AA) to be able to conclude that there will be no adverse effects on the integrity of the SAC. The National Trust is currently working with DBC and Natural England on the development of a strategic solution (SAMM), including a Mitigation Strategy for the Chilterns Beechwoods SAC. Natural England also advise that a Suitable Alternative Natural Greenspace (SANG) may be required as part of the strategic solution.</p> <p>This application has been submitted prior to a strategic solution being adopted by Dacorum Borough Council. The National Trust is mindful of the advice that DBC has set out on its website about how they are dealing with applications for new residential development in the interim. In considering this application, the LPA would need to ensure that the development itself would not harm the SAC either alone or in combination with all other planning applications in the ZOI.</p> <p>Consultation with Natural England (as statutory consultee) on this matter will be required. It is understood that the applicant is proposing a bespoke mitigation package. It is a matter for the LPA as to whether they consider this approach is acceptable (enabling it to discharge its legal duties and ensuring the proposal accords with national and local planning policy). If a bespoke mitigation package is agreed it should be ensured through a legal agreement or appropriately worded conditions that any mitigation is made available prior to first occupation of the development. However the LPA should also be mindful that agreement to a bespoke solution could set a precedent for planning applications at other sites.</p>
<p>Network Rail</p>	<p>The proposal itself is some distance from the railway boundary. However, Tring Railway Station is within close proximity:</p> <p>The TA states:</p> <p>Vehicular access to the proposed development will be provided via a new priority controlled T junction with a ghost island right turn on Bulbourne Road, and a new signal controlled junction on Station Road. These two junctions will be connected internally by Main Street, a 20mph spine road. Main Street will also convey the proposed bus service, a new route connecting the railway station and town centre via the proposed development at a much improved frequency to existing services. This service will benefit all existing and new residents within its catchment, enhancing the opportunities for journeys to destinations near and further away to be made by bus and then rail.</p>

	<p>Enhancements to the offering at the railway station forecourt are proposed to further improve the multimodal connectivity. A new shelter will be provided for use by bus and taxi passengers, improving the waiting experience during inclement conditions. Real time passenger information for the bus service will also be available. Additional cycle parking will be provided also, to provide a greater degree of certainty of finding a parking space. A marked crossing point will also be provided to the main station area from the forecourt, substantially reducing the opportunity for conflict between pedestrians and vehicles which currently exists.</p> <p>The council should note that it is the Train Operator that is the customer service provider so they should be more able to determine what enhancements could make the passenger experience better - Tring is a Category C station - and there is not a lot of space to expand where it is.</p> <p>Network Rail would therefore recommend that the council/developer consult with the train operating company to discuss the possible enhancements and costs where relevant.</p>
Waste Services (DBC)	<p>Houses should have space to store 3 x wheeled bins and a curb side caddy and somewhere to present 2 x wheeled bins and the caddy outside their boundary on collection day.</p> <p>Flats should have a storage area large enough to house accessible containers at the ratio of ix 1100ltr container for residual waste, 1 x 1100ltr container for comingled recycling and 1 x 140ltr wheeled bin for food waste per 6 flats. There should be no steps between the storage area and the collection vehicle. The developer needs to purchase the first set of containers.</p> <p>Commercial properties have varying requirements for waste but at a minimum there should be provision for 1 x 1100ltr container for residual waste, , 1 x 1100ltr container for comingled recycling and 1 x 140ltr wheeled bin for food waste. Commercial waste should always be stored in separate areas to domestic waste.</p> <p>School requirements will depend on the size of the school.</p> <p>In all cases the properties will be serviced by a 26ton rigid freighter.</p>
Sport England	<p>Summary: While some of the proposals made for meeting the community's formal sports provision needs are welcomed in principle, as there are a number of matters where it has been requested that further information is required or an alternative approach should be considered before the application is determined, an objection is made</p>

to the planning application in its current form. However, I would be willing to withdraw this objection in due course if the advice set out in this response is considered and positive proposals are made to address the matters through the planning application or planning obligation/condition requirements.

It is requested that any planning permission makes provision for securing formal community use agreement on school sites and for securing the management/governance arrangements for the community sports facilities.

It is requested that a planning condition is imposed requiring subsequent reserved matters applications to demonstrate how Active Design principles have been considered in the detailed design of the development.

Sport England - Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>. This application falls within the scope of the above guidance as it relates to a development of more than 300 dwellings.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework (NPPF). Sport England's planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Sport England's Planning for Sport guidance can be found here: <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-for-sport-guidance/>

Assessment against Sport England's Objectives and the NPPF

Residential Development: Community Sports Facility Needs

Introduction

The proposal involves a hybrid application for a residential led mixed use development of up to 1,400 dwellings on land to the east of Tring to be known as Marshcroft. The outline element of the application would include a sports hub that would provide indoor and outdoor sports facilities that would be co-located with a secondary school and potentially a community hall. Both the sports hub and secondary

school would share the sports facilities. A primary school is also proposed adjoining the sports hub. The population of the development is estimated to be around 3,500 people based on the population estimates used in the planning application documents. This additional population will generate additional demand for community sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating or exacerbating existing deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new community sports facility needs arising as a result of the development. A Sport and Physical Activity Strategy has been submitted for approval which provides detail of the sports facility proposals. In this context, I would wish to make the following comments on the community sports provision aspects of the planning application:

Evidence Base and Policy Context

The evidence base for community sport and the local planning policy context can be summarised as follows:

- . Saved Policy 76 of the adopted Dacorum Local Plan (2004) advises that major developments may be required to contribute to off-site provision of sports pitches or the enhancement of existing parks or playing fields;
- . Policy CS23 of the adopted Dacorum Core Strategy (2013) requires all new development to contribute towards the provision of social infrastructure which includes sports facilities;
- . Policy DM62 of the emerging Dacorum Local Plan (2020) expects all new residential development to contribute towards additional sport and playing pitch provision using Sport England's Playing Pitch Calculator (for outdoor sports)
- . The Council's Dacorum Playing Pitch Strategy (2019) identifies a range of deficiencies in outdoor sports provision in the Tring area and accounts for future population needs.
- . The Council's Dacorum Leisure Facilities Strategy (2019) covers indoor sports facilities such as swimming pools and sports halls and identifies the need to invest in the quality of swimming pools in the district including Tring and address the issue of daytime access to sports halls in Tring.

Outdoor Sports Provision

It is acknowledged that the Parameter Plans only provide limited detail of the outdoor sports facility proposals and that the Illustrative Masterplan has only been submitted for illustrative purposes. The Sport and Physical Activity Strategy provides a framework for outdoor

sports provision that is intended to be refined through the application process. In this context, Sport England's advice on the approach to outdoor sports provision is as follows:

. Quantity of Provision: The development makes provision for 64.29 hectares of open space of which 22.02 ha would be amenity space, parks and gardens and adult/youth spaces. It is unclear what amount would be principally intended and designed for meeting formal outdoor community sports needs as it is expected that much of the referenced 22.02 ha would not be suitable or intended for outdoor sports use. In the Sport and Physical Activity Strategy, the applicant has assessed open space provision against policy 76 of the adopted Local Plan which uses Fields in Trust (formerly NPFA) standards of provision. However, the approach in the adopted Local Plan is based on an out-of-date evidence base which has now be superseded by the Council's more recent Playing Pitch Strategy. The Playing Pitch Strategy and the emerging Local Plan advocate the use of the Playing Pitch Calculator for assessing the additional demand generated by residential developments rather than the use of the historic Fields in Trust standards. The Council will therefore need to decide which approach should be used for assessing outdoor sports needs. While the status of the policy approach in the adopted Local Plan is acknowledged, the evidence base that supported it is no longer robust and the Council are now using the Playing Pitch Calculator for informing the emerging Local Plan and IDP as it is up-to-date and based on the current evidence base. Whichever approach is taken, provision should be made in the section 106 agreement for a minimum quantum of community outdoor sports facility provision (in area) to be provided which would be principally intended and designed for formal outdoor sports use in order to ensure that an appropriate quantum of outdoor sports space is provided in practice which is suitable for formal sports use.

. Form of Provision: It is proposed that outdoor sports provision will principally be made in the form of a sports hub that would be co-located with an adjoining secondary school and primary school and that the secondary school would share some of the sports hub facilities. The principle of the joint provision and co-location of the facilities is welcomed as it could offer a range of potential benefits to the school and the community such as financial sustainability, operational efficiencies, and development of school-club links. However, for this approach to be acceptable in practice, Hertfordshire County Council (as the local education authority) would need to be supportive and this is not a model of provision that the County Council have traditionally supported. Consideration would also need to be given at an early stage to how a sports hub that was shared by the secondary school would be managed as the success of this approach

would depend on a sustainable model being implemented over a long term period as the school will be dependent on the facilities being available and suitably maintained over a long term period for meeting their educational needs. While the principle of this approach is welcomed, it is therefore requested that this be discussed with Hertfordshire County Council and Dacorum Borough Council to determine whether this model can be pursued in practice. It is acknowledged that reserved matters application would determine the layout and design of the sports hub and the school sites. However, as it is proposed that a range of community outdoor sports facilities would be provided in the sports hub plus additional community pitches provided on the secondary and primary school sites, linked to the above comments on the quantity of provision, it is considered necessary for it to be demonstrated in indicative terms that all of the proposed facilities that are needed could be accommodated in the sports hub and school sites before parameter plans are approved or minimum quantum of provision are secured. This would help avoid a potential scenario (which has arisen on other schemes) where it is not possible to accommodate all of the proposed facilities in the proposed sports hub due to insufficient consideration being given at the outline planning application stage. To address this, once the minimum sports facility mix for the sports hub has been agreed, it is requested that an indicative sports hub and secondary/primary school layout (for illustrative purposes) is prepared to demonstrate how the minimum community outdoor sports facility mix plus school facility needs could be accommodated in practice.

Football: To meet adult football needs it is proposed that a full size 3G artificial grass pitch (AGP) be provided at the sports hub that would be shared with the secondary school together with at least one senior grass pitch being provided on the school over and above that required for the school's use. To meet youth and mini football needs it is proposed that as well as the 3G AGP (which can be used for junior and mini pitches as well as adult pitches), that 3 additional youth grass pitches would be provided on the secondary school site and 2 additional mini grass pitches would be provided on the primary school beyond that required by the schools. The broad approach is welcomed as the provision proposed would be expected to meet and exceed the additional demand for football pitches generated by the development. However, the potential concern would relate to how the additional senior, youth and mini pitches (beyond those required by the schools) would be used and managed in practice if provided within the school sites and managed by the schools. Based on experience, there is a potential concern that the schools would treat the additional pitches as school pitches and priority of use may be given to school use which may result in the pitches not having the capacity for meeting community needs. Furthermore, conventional school pitch maintenance programmes may not ensure that the pitches are

maintained to a standard suitable for community use over a long term period. Access to such pitches would also be dependent on a community use agreement being successfully implemented over a long term period. It is also questioned whether a school would be willing and able to manage community pitches over a long term period if not required for meeting their own needs. It is therefore requested, that as an alternative the additional pitches being provided on the school sites that the additional pitches be provided in the sports hub and managed by the community body that would manage the sports hub. The adjoining schools could then be given access to use the pitches if required if the pitches have the carrying capacity. This would help ensure that the pitches are maintained to a standard to support community use and give the community priority access over the use of the pitches while still maintaining the flexibility for the school to use the pitches if required. Provision would need to be made for the 3G AGP to be designed in accordance with the FA's design guidance and for the grass pitches to be designed and constructed in accordance with Sport England's design guidance in order to ensure that the facilities are fit for purpose and suitable for meeting community needs. The Hertfordshire Football Association has recommend that consultation takes place with local community football clubs to confirm club support and demand for the proposed facilities.

Rugby Union: No on-site provision is made for meeting rugby union needs. Instead it is proposed that the 3G AGP and grass football pitches provided in the development would allow football clubs to relocate from land adjoining Tring RUFC's site to the application site and thereby free up space for additional rugby union pitches to be marked out. I have consulted the RFU about this proposal and they have advised that this scenario is unlikely to materialise. Tring Tornadoes FC own the land adjoining Tring RUFC and are therefore very unlikely to relocate from the site to use pitches that they have no security of tenure over. Furthermore, the Playing Pitch Strategy shows that there are significant existing deficiencies in football pitch provision in the Tring area. Any relocation of football activity to the application site from the Tring Tornadoes FC site is likely to result in the football pitch demand being backfilled by Tring Tornadoes FC's own use that is currently not accommodated on their own site or demand from other football clubs. Therefore it is not considered that this proposal would meet the additional rugby union demand generated by the development. The RFU has advised that following consultation with Tring RFC and the Hertfordshire RFU, the preferred solution to meeting additional rugby union needs would be for a financial contribution to be secured towards improving capacity at Tring RFC's site. In addition, it would be advocated that the 3G AGP proposed in the sports hub be designed with a rugby union compliant surface (known as a WR22 compliant surface) to allow it to be used by the school and the community for rugby union use. It is therefore

requested that the approach to rugby union provision is reviewed.

. Cricket: The approach to cricket provision is unclear because Table 7.1 of the Sport and Physical Activity Strategy proposed that additional cricket demand be met through a cricket square and artificial cricket nets being provided on the new secondary school site while paragraph 8.10 of the same document proposes that just 3 artificial cricket nets be provided on the school site. Clarity is therefore requested on what is actually proposed. I have consulted the ECB and Hertfordshire Cricket and they have advised that regardless of what is actually proposed on the school site that there is a lack of cricket pitch capacity in the local area and that therefore the principle of either additional cricket pitch provision on site (as part of the sports hub) or investment into expanding the capacity of the existing local club facilities i.e. Tring Cricket Club would be welcomed. While an artificial cricket wicket being provided on the secondary school site would be suitable for meeting the school's needs and could be used by the community for training use it would not be suitable for meeting match needs. Additional provision on site or off site would therefore be required to fully meet the additional cricket pitch needs generated by the development. Further details are therefore requested of the approach to meeting additional cricket needs.

. Hockey: No new hockey facilities are being planned as it is suggested that hockey needs are being met by another development. Berkhamsted & Hemel Hempstead's Hockey Club facility needs are expected to be substantially met by a new hockey pitch that is currently being constructed on the club's site. However, Tring Hockey Club, which is the local club serving the application site would continue to use the facility at the Tring Sports Centre and the facility at RAF Halton that is due to close. Beyond the short term, this club would therefore be dependent on the facility at the Tring Sports Centre for meeting the additional needs generated by the development. As set out in the Playing Pitch Strategy, the AGP at the Tring Sports Centre is in need of its surface being replaced in order to continue to meet local hockey needs. Even if the AGP is resurfaced in the short term it will need replacing approximately every 10 years. It is therefore considered appropriate for the development to make a proportionate contribution towards the replacement of the Tring Sports Centre AGP surface to ensure that the additional demand generated can be met in practice. It is therefore requested that an off-site financial contribution is secured towards this project. Advice can be provided on the level of a financial contribution that would be requested.

. Tennis and Netball: It is proposed that tennis and netball provision would be made as part of a 90x40m multi-use games area (MUGA) proposed at the sports hub that would be shared with the secondary school. I have consulted the LTA who has advised that the local priority in Tring for tennis is currently focused around improving

the existing public tennis courts at Pound Meadow but that the opportunity for additional public tennis facilities which would offer the potential to develop new school-club links would be welcomed in principle. The use of the proposed MUGA by the community would only be acceptable in principle if it was floodlit and the design in terms of surface, line marking and fencing met Sport England's design guidance. It should be noted that the specification for a community MUGA would be different to a school MUGA designed to meet DfE guidance e.g. a school MUGA would not include floodlighting. It will therefore be essential that a section 106 agreement makes provision for a MUGA to be entirely funded by the development or (if the County Council would be funding the MUGA as part of the school) that the costs of upgrading a MUGA designed to meet DfE guidance to a facility that would meet Sport England guidance are identified and secured. Provision would need to be made for securing this through a section 106 agreement.

. Location & Accessibility: The location of the sports hub and schools in the centre of the development with good access by walking and cycling to the proposed residential areas and the existing urban area of Tring is welcomed. It is noted that the sports hub would be separated from the secondary school by a walking/cycling route and from the primary school by an existing highway. While this is positive from an active travel perspective in terms of accessing the sports hub, consideration will need to be given in the detailed design to how the schools will access the sports hub in the context of safeguarding and highway safety considerations as it would be undesirable for students to be exposed to potential risks if they need to leave the confines of the school site to access the sports hub. Advice from Hertfordshire County Council should be sought in this regard.

. Ancillary Facilities: The outdoor sports facilities proposed in the sports hub will need to be supported by suitable changing, refreshment and social facilities in the building that will support the hub. Paragraph 8.9 of the Sport and Physical Activity Strategy refers to additional changing facilities being provided to meet the requirements of the outdoor facilities which is welcomed. There will need to be separate changing rooms to support the outdoor facilities in order to provide capacity at peak times and to avoid operational issues associated with the shared use of changing rooms by indoor and outdoor sports. A minimum specification for the sports hub building should be included in a section 106 agreement to provide certainty of the minimum requirements in this regard. While active travel to the sports hub is encouraged, provision will need to be made for adequate car parking to support the use of the hub in recognition that a large proportion of users will not reside within the development or the local area (i.e. away teams and officials in particular) The minimum level of car parking to support the sports hub should also be

included in a section 106 agreement. The indicative sports hub layout requested above should identify the indicative scale and location of the building and parking facilities.

. Detailed Matters: Planning Obligations and Conditions: A range of matters will need to be addressed at the reserved matter stage to help ensure that the detailed planning, design and layout of the sports ground provided is acceptable in practice. Securing these matters through an outline planning permission is required to ensure that the matters raised above are satisfactorily addressed in practice including consideration of whether the actual facilities proposed are responsive to local community needs at the time, whether the design and layout is fit for purpose and whether appropriate and sustainable facility management is in place. Sport England has model planning conditions that can assist the Council in this regard which are on our website at https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy. It is requested that the following matters be addressed:

- Submission and approval of the design and layout of the sports hub if not required as part of a wider reserved matters requirement - see condition 9a of model conditions schedule;
- Submission and approval of a sports pitch feasibility study and construction specification for the natural turf playing fields to ensure that the construction and design of natural turf playing pitches is fit for purpose - see condition 10a of model conditions schedule;;
- Securing in a section 106 agreement, details of agreed management and maintenance arrangements for the sports hub.

Indoor Sports Provision

The Sport and Physical Activity Strategy provides a framework for indoor sports provision that is intended to be refined through the application process. In summary, the sports hub would provide a 1,532 sq.m building that would include a range of facilities and would be shared with the adjoining secondary school. Paragraph 8.5 of the Sport and Physical Activity Strategy summarises the facilities that are expected to be provided but qualifies that a needs assessment will be undertaken prior to the detailed design stage to confirm that the facility is viable and fully meets the needs of the local area. In this context, Sport England's advice on the approach to indoor sports provision is as follows:

. Sports Halls: A four court sports hall to a community use specification would be provided which would also be used by the secondary school. This would exceed the additional demand generated by the development. This would be welcomed acceptable in principle subject to the sports hall being designed to meet Sport England's design guidance. It should be noted that the specification

for a community sports hall would be different to a school sports hall designed to meet DfE guidance e.g. a school 4 court sports hall would be smaller in size as it would have reduced run-off areas. It will therefore be essential that a section 106 agreement makes provision for a sports hall to be entirely funded by the development or (if the County Council would be funding the sports hall as part of the school) that the costs of upgrading a sports hall designed to meet DfE guidance to a facility that would meet Sport England guidance are identified and secured. It is therefore requested that provision be made for securing this through a section 106 agreement.

. Swimming Pools: No swimming pool provision is proposed in the development. This is acceptable because the Council's Leisure Facilities Strategy has not identified a need for additional water space provision in Tring to meet future needs. While the existing pool at Tring Sports Centre has been recently refurbished, there is likely to be a need for a further refurbishment in the long term in order to ensure that the quality of the facilities are provided to a standard to meets the needs and expectations of the community. A contribution towards further improvements at Tring Sports Centre has been offered and this is considered to be acceptable in principle subject to an appropriate contribution being identified and secured through a section 106 agreement in practice. Advice on an appropriate financial contribution can be provided upon request. It is therefore requested that such a contribution is secured in practice;

. Health & Fitness and Studios: A 26 station health and fitness facility and a new activity studio are proposed in response to the demand estimated by the proposed population. While the quantum of provision proposed may be directly responsive to the additional demand generated by the population of the development, this does not necessarily mean that this level of provision will be viable and responsive to community needs. For instance, many similar leisure centre facilities would provide a health and fitness facility that would have capacity for more than 26 stations to provide the number and range of fitness stations to support a viable gym while more than one activity studio would usually be provided to allow different activities to be accommodated during peak periods. It will be essential therefore for these initial proposals to be refined by a needs assessment and feasibility study prior to a reserved matters application being submitted for the sports hub in order to ensure that a suitable and sustainable facility is delivered in practice. The section 106 agreement should therefore build in a requirement for a needs assessment and feasibility study to be undertaken that would review health & fitness and studio provision and allow the level of provision to be amended depending on the recommendations in the feasibility. The agreement should avoid provision being limited to a 26 station health and fitness facility and a single activity studio therefore. It is therefore requested that a section 106 agreement makes provision for the scale of the health and fitness

centre and the number of studios to be informed by a needs assessment.

. Community Hall: While not intended to be a sports facility, the proposed community hall would offer potential to provide a secondary facility where some indoor sports and physical activities could take place to complement the facilities provided in the sports hub without compromising its multi-functional role. For example, if suitably designed a hall could be used for dance, fitness and martial arts. Potential co-location with the sports hub as currently proposed could also offer some operational advantages. It is advocated that a community hall is designed in accordance with Sport England's Village and Community Halls design guidance to help ensure that the opportunities for it to contribute towards meeting indoor sports facility needs are maximised.

Conclusion on Sports Facility Provision

While many of the proposals made for meeting formal sports provision needs are welcomed in principle, as there are a number of matters that require further consideration and addressing as requested above before the application is determined, an objection is made to the planning application in its current form. However, I would be willing to withdraw this objection in due course if the above advice is considered and positive proposals are made to address the matters through the planning application or planning obligation/condition requirements.

Community Access to School Sites

If some of the community's sports facility needs are to be met on the secondary and primary school sites on areas that would be controlled by the school's governing body/educational trust, it would be essential that a formal community use agreement is a requirement of planning permission to provide certainty that community access to the facilities would be secured over a long term period. It is therefore be requested that this requirement be secured through a section 106 agreement or a planning condition (see model condition 16 of our conditions schedule).

Sports Facility Governance/Management

The broad proposals in section 9 of the Sport and Physical Activity Strategy for the governance arrangements for the sports hub are welcomed and it is agreed that the options set out in paragraph 9.4 for operating the hub will need to be explored. The role of existing sports clubs and other community bodies should be considered in the management and development of sport and physical activity related assets. In major new developments, existing sports clubs can play an

	<p>important role in helping set up new sports clubs e.g. as a satellite of an existing club because they already have the coaching and volunteer infrastructure and capacity to support club development which is difficult to establish in a new community especially during the formative years. Some clubs can also potentially take a role in the management of sports facilities. Sports governing bodies can provide advice on facility management and governance matters and some of them also have a potential role to play in managing facilities. As set out above, it is requested that the section 106 agreement should make provision for the management and maintenance arrangements to be agreed and secured as well as community use agreements.</p> <p>Active Design</p> <p>Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015) https://www.sportengland.org/facilities-planning/active-design/, a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with section 8 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments. It is also noted t</p>
Cadent Gas Limited	<p>Thank you for your email.</p> <p>This application falls outside of Cadent's distribution network. Please contact your local Gas distributor and/or National Grid for comments on this application.</p>
Affinity Water - Three Valleys Water PLC	<p>I can confirm that Affinity Water have no comments to make on the proposed development as the site lies outside our company boundary.</p>
Thames Water	<p>Waste Comments</p> <p>With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure</p>

phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Water Comments

Thames Water are currently working with the developer of application 22/01187/MOA to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 49 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the 49 dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to

low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Supplementary Comments

No documentation containing confirmed details of the proposed foul drainage plan could be located on the Local Authority website. For Thames Water to determine whether the existing sewer network has sufficient spare capacity to receive the increased flows from the proposed development, a drainage strategy must be submitted detailing the foul water strategy. Details of any proposed connection points or alterations to the public system, including calculated discharge rates (pre and post development) must be included in the drainage strategy.

Further comments received 28.07.22

Thames Water would want certainty that the development is approved and going to be built, so the upgrades do not have to be confirmed/completed before approval. Until a foul water drainage strategy has been provided, we can confirm that there is not enough capacity within the existing sewer network for the increased flows due to the size of the proposed development. The phasing plan would enable Thames Water ensure that all upgrades are made in regards to Waste Water so that the networks are able to accommodate the development within the agreed timeframe.

Thames Water would expect the following information to enable to agree a phasing plan.

- 1) Thames Water would expect to know the stages at which sections of the development will be occupied.
- 2) Point of connection for water supplies.
- 3) The point where wastewater will be discharged and whether flows will be gravity or pumped.

I hope that this assists you with your enquiry.

FURTHER COMMENTS RECEIVED 13.09.22

Further to my original formal response to the above application dated 12th May 2022 I am writing to provide an updated response following receipt of the additional information submitted by the applicant. In particular, the applicant has recently submitted an updated Sports & Physical Activity Strategy and associated Technical Note (July 2022) which have responded to the comments made in our original response and subsequent discussions. I would therefore request that this response be treated as superseding our previous formal response.

Summary: The approach to providing for the additional community sports facility needs generated by the development is broadly supported subject to a range of planning obligations and conditions being secured through any planning permission as set out in this response.

It is requested that any planning permission makes provision for securing formal community use agreements on the school sites.

It is requested that a planning condition is imposed requiring subsequent reserved matters applications to demonstrate how Active Design principles have been considered in the detailed design of the development.

Sport England - Non Statutory Role and Policy

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>. This application falls within the scope of the above guidance as it relates to a development of more than 300 dwellings.

Sport England assesses this type of application in line with its planning objectives and with the National Planning Policy Framework

(NPPF). Sport England's planning objectives are to PROTECT existing facilities, ENHANCE the quality, accessibility and management of existing facilities, and to PROVIDE new facilities to meet demand. Sport England's Planning for Sport guidance can be found here: <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-for-sport-guidance/>

Assessment against Sport England's Objectives and the NPPF

Residential Development: Community Sports Facility Needs

Introduction

The proposal involves a hybrid application for a residential led mixed use development of up to 1,400 dwellings on land to the east of Tring to be known as Marshcroft. The outline element of the application would include a sports hub that would provide indoor and outdoor sports facilities that would be co-located with a potential secondary school. Both the sports hub and secondary school would share some of the sports facilities proposed in the sports hub although a commitment is made to funding and developing the sports facilities regardless of whether the secondary school is implemented in practice. It is also proposed that a separate cricket ground will be provided adjoining the secondary school site which would have pavilion facilities integrated into a community hall. A primary school is also proposed adjoining the sports hub. The population of the development is estimated to be around 3,500 people based on the population estimates used by the applicant in the planning application documents. This additional population will generate additional demand for community sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating or exacerbating existing deficiencies in facility provision. In accordance with the NPPF, Sport England seeks to ensure that the development meets any new community sports facility needs arising as a result of the development. In this context, I would wish to make the following comments on the community sports provision aspects of the planning application:

Evidence Base and Policy Context

The evidence base for community sport and the local planning policy context can be summarised as follows:

. Saved Policy 76 of the adopted Dacorum Local Plan (2004) advises that major developments may be required to contribute to off-site provision of sports pitches or the enhancement of existing parks or playing fields;

- . Policy CS23 of the adopted Dacorum Core Strategy (2013) requires all new development to contribute towards the provision of social infrastructure which includes sports facilities;
- . Policy DM62 of the emerging Dacorum Local Plan (2020) expects all new residential development to contribute towards additional sport and playing pitch provision using Sport England's Playing Pitch Calculator (for outdoor sports)
- . The Council's Dacorum Playing Pitch Strategy (2019) identifies a range of deficiencies in outdoor sports provision in the Tring area and accounts for future population needs.
- . The Council's Dacorum Leisure Facilities Strategy (2019) covers indoor sports facilities such as swimming pools and sports halls and identifies the need to invest in the quality of swimming pools in the district including Tring and address the issue of daytime access to sports halls in Tring.

Outdoor Sports Provision

It is acknowledged that the Parameter Plans only provide limited detail of the outdoor sports facility proposals and that the Illustrative Masterplan has only been submitted for illustrative purposes. The updated Sport and Physical Activity Strategy provides a framework for outdoor sports provision. In this context, Sport England's advice on the approach to outdoor sports provision is as follows:

- . Quantity of Provision: The development makes provision for 64.29 hectares of open space of which 5.8 hectares would be for outdoor sports provision including 5.2 hectares of playing pitch provision. In the updated Sport and Physical Activity Strategy, the applicant has assessed open space provision against policy 76 of the adopted Local Plan which uses Fields in Trust (formerly NPFA) standards of provision which is understood to still be the current policy basis for assessing provision. As shown by section 7 of the updated Sport and Physical Activity Strategy the level of provision proposed would exceed the minimum requirement (5.6 ha (4.2 ha of playing pitches) when applying this standard to the estimated population of the development. However, the approach in the adopted Local Plan is based on an out-of-date evidence base which has now be superseded by the Council's more recent Playing Pitch Strategy. The Playing Pitch Strategy and the emerging Local Plan advocate the use of the Playing Pitch Calculator for assessing the additional demand generated by residential developments rather than the use of the historic Fields in Trust standards. The calculator outputs for the estimated population have been provided to the applicant and as set out in Table 7.2 of the updated Sport and Physical Activity Strategy, the demand generated for the various types of playing pitch provision would either be met or exceeded on-site or provision is proposed off-

site. I am therefore satisfied that the quantity of outdoor sports provision proposed would be adequate for meeting the additional demand generated by the development and that this position would apply when assessing provision against both of the abovementioned methods of quantifying the additional demand generated by the development.

. Form of Provision: As set out above, it is proposed that outdoor sports provision will principally be made in the form of a sports hub that would be co-located with a potential adjoining secondary school (to the north of the school site) and that the secondary school would share some of the sports hub facilities if the school is delivered in practice. The sports hub would include a full size 3G artificial grass pitch, a junior football pitch and 2 mini football pitches as well as two changing rooms dedicated to outdoor sports provision in the sports hub building. A floodlit macadam multi-use games area suitable for tennis, netball and basketball would also be provided as part of the sports hub. A separate cricket ground (to the south of the secondary school site) would be provided that would include a cricket square and space in the outfield area for a senior football pitch to be marked out. Supporting pavilion and parking facilities would be provided as part of the community hall proposed adjoining the cricket ground. The principle of the joint provision and co-location of the facilities in a sports hub is welcomed as it could offer a range of potential benefits to the school and the community such as financial sustainability, operational efficiencies, and development of school-club links. As set out in the updated Sport and Physical Activity Strategy there is a commitment to deliver the outdoor sports facilities in a single phase regardless of whether the school is implemented. A conceptual layout plan provided by the applicant shows that in very indicative terms there would be space on the sports hub and the cricket ground sites to accommodate the outdoor sports facilities proposed but this would need to be confirmed through feasibility studies and detailed design prepared at a reserved matters stage.

. Football: To meet football needs it is proposed that a full size 3G artificial grass pitch (AGP) will be provided in the sports hub that would be shared with the potential secondary school together with two mini and one junior natural turf football pitches while a senior natural turf football pitch will be provided on the cricket ground site. All of the natural turf pitches would be dedicated for community use. The 3G AGP would have multiple pitch markings so that it can be used flexibly for adult, junior and mini pitch use although not at the same time. If the secondary school is developed potential would also exist for natural turf football pitches on the school site to be made available for community use if they have the carrying capacity to support community use as well as school use. The Herts FA have no objection to the principle of the proposals for meeting football needs

but provision would need to be made for the 3G AGP to be designed in accordance with the FA's design guidance and for the grass pitches to be designed and constructed in accordance with Sport England's design guidance in order to ensure that the facilities are fit for purpose and suitable for meeting community needs. The Hertfordshire Football Association has recommend that consultation takes place with local community football clubs to confirm club support and demand for the proposed facilities.

. Rugby Union: No on-site provision is made for meeting rugby union needs. Instead it is proposed that an off-site contribution is made towards providing specific improvements at Tring RUFC to improve the capacity of the pitches and ancillary facilities. This approach is supported as it would be consistent with feedback from the RFU who have consulted with Tring RFC and advised that improvements to capacity at the rugby club site would be preferential to on-site provision that would be remote from the club site.

. Cricket: A cricket square and associated outfield area are proposed on a cricket ground adjoining the secondary school site that would be supported by the community hall that would adjoin the site and provide pavilion facilities for supporting the cricket ground. I have consulted the ECB and Hertfordshire Cricket and they have advised that there is a lack of cricket pitch capacity in the local area and that the principle of an additional cricket pitch provision on site would be welcomed. Provision should be made for a non-turf pitch (artificial wicket) and cricket practice nets to support the cricket square as this would provide the necessary cricket match and training facilities to support the use of the cricket ground.

. Hockey: No on-site provision is made for meeting hockey needs. Berkhamsted & Hemel Hempstead's Hockey Club facility needs have been substantially met by a new hockey pitch that has recently been constructed on the club's site. However, Tring Hockey Club, which is the local club serving the application site would continue to use the facility at the Tring Sports Centre and the facility at RAF Halton that is due to close. Beyond the short term, this club would therefore be dependent on the facility at the Tring Sports Centre for meeting the additional needs generated by the development. As set out in the Playing Pitch Strategy, the AGP at the Tring Sports Centre is in need of its surface being replaced in order to continue to meet local hockey needs. Even if the AGP is resurfaced in the short term it will need replacing approximately every 10 years. It is therefore considered appropriate for the development to make a proportionate contribution towards the replacement of the Tring Sports Centre AGP surface to ensure that the additional demand generated can be met in practice. The proposal in the updated Sport and Physical Activity Strategy for an off-site contribution to be made towards existing hockey facilities at the Tring Sports Centre is therefore welcomed in principle.

. Tennis, Basketball and Netball: It is proposed that tennis, basketball and netball provision would be made as part of a floodlit 90 x 40 metre multi-use games area (MUGA) proposed at the sports hub that would be shared with the potential secondary school. I have consulted the LTA who has advised that the local priority in Tring for tennis is currently focused around improving the existing public tennis courts at Pound Meadow but that the opportunity for additional public tennis facilities which would offer the potential to develop new school-club links would be welcomed in principle subject to the facility being floodlit and the surface, line marking and fencing meeting Sport England's design guidance. The MUGA would also be suitable for meeting additional basketball and netball needs arising from the development. The principle of the MUGA is therefore welcomed;

. Location & Accessibility: The location of the sports hub, cricket ground and schools in the centre of the development with good access by walking and cycling to the proposed residential areas and the existing urban area of Tring is welcomed.

. Ancillary Facilities: The dedicated outdoor changing facilities provided in the sports hub building to support the football pitches are welcomed as set above as are the proposal to provide a community sports reception, café, bar and social space for community and club access. The proposal to provide changing facilities and other clubhouse facilities to support the cricket facilities and senior football pitch as part of the community centre is also welcomed.

Indoor Sports Provision

The updated Sport and Physical Activity Strategy proposes that indoor sports facility provision will be provided in the 1,600 sq.m sports hub building that would include a range of facilities and would be shared with the potential secondary school that would adjoin the sports hub. Paragraph 8.5 of the Sport and Physical Activity Strategy summarises the facilities that are proposed but qualifies that a feasibility study will be undertaken prior to the reserved matters to inform the exact size and capacity of the fitness gym facility. In this context, Sport England's advice on the approach to indoor sports provision is as follows:

. Sports Halls: A four court sports hall to a community use specification would be provided which would also be used by the potential secondary school. This would exceed the additional demand generated by the development. This would be acceptable in principle subject to the sports hall being designed to meet Sport England's design guidance. It should be noted that the specification for a community sports hall would be different to a school sports hall designed to meet DfE guidance e.g. a school 4 court sports hall would

be smaller in size as it would have reduced run-off areas. It will therefore be essential that provision is made for a facility that would meet Sport England's design guidance;

. Swimming Pools: No swimming pool provision is proposed in the development. This is acceptable because the Council's Leisure Facilities Strategy has not identified a need for additional water space provision in Tring to meet future needs. While the existing pool at Tring Sports Centre has been recently refurbished, there is likely to be a need for a further refurbishment in the long term in order to ensure that the quality of the facilities are provided to a standard to meets the needs and expectations of the community. A contribution towards further improvements at Tring Sports Centre has been offered and this is considered to be acceptable in principle subject to an appropriate contribution being identified and secured;

. Health & Fitness and Studios: A 26 station health and fitness facility and a new activity studio are proposed in response to the demand estimated by the proposed population. While the quantum of provision proposed may be directly responsive to the additional demand generated by the population of the development, this does not necessarily mean that this level of provision will be viable and responsive to community needs. For instance, many similar leisure centre facilities would provide a health and fitness facility that would have capacity for more than 26 stations to provide the number and range of fitness stations to support a viable gym while more than one activity studio would usually be provided to allow different activities to be accommodated during peak periods. It will be essential therefore for these initial proposals to be refined by a feasibility study prior to a reserved matters application being submitted for the sports hub in order to ensure that a suitable and sustainable facility is delivered in practice. .

. Community Hall: While not intended to be a dedicated sports facility, the proposed community hall would offer potential to provide a secondary facility where some indoor sports and physical activities could take place to complement the facilities provided in the sports hub without compromising its multi-functional role. For example, if suitably designed a hall could be used for dance, fitness and martial arts.

Conclusion on Sports Facility Provision

The updated Sport and Physical Activity Strategy has demonstrated that the majority of the additional demand for sports facilities generated by the proposed development would be met on site through the facilities proposed in the sports hub and the cricket ground with potential for the secondary school and the community centre to also make additional secondary forms of provision. For the facilities that would not be provided on-site, off-site provision would be made in the

form of financial contributions towards the delivery of new/enhanced facilities on existing sports facility sites in the Tring area. The approach to sports facility provision is therefore broadly supported. However, this position is strictly subject to provision being made in any planning permission for the facilities to be secured and delivered in practice and for the detailed design to be addressed as part of reserved matters applications. It is therefore requested that provision is made through planning obligations and conditions for the following:

Planning Obligations:

A planning obligation such as a section 106 agreement or unilateral undertaking should make provision for securing a minimum range of sports facilities on-site through the proposed sports hub and cricket ground sites. The facilities required are set out in the specification in section 8 of the updated Sport and Physical Activity Strategy but Sport England would request that provision is made specifically for the following minimum specification:

Sports Hub Building

Minimum footprint of 1,600 sq.m gross internal floor area and to include:

- . 4 court sports hall with minimum dimensions of 34.5 x 20 metres to accord with Sport England design guidance;
- . Activity Studio to accord with Sport England design guidance
- . Fitness Gym with space for at least 26 stations to accord with Sport England design guidance. Provision to be made for a feasibility study to be prepared to inform the size and the capacity of the fitness gym in advance of a reserved matters application being submitted;
- . Two team changing rooms for indoor use to accord with Sport England guidance;
- . Two team changing rooms for outdoor use to accord with Football Foundation guidance;
- . Two officials changing rooms for outdoor use to accord with Football Foundation guidance;
- . Community sports reception, café/bar and social space to accord with Sport England guidance;
- . Separate dedicated pedestrian access for potential secondary school use.

Sports Hub Outdoor Sports Facilities

- . Floodlit and fenced (4.5m high) 3G artificial grass pitch with dimensions of 106 x 70 metres with spectator provision to meet Football Association design guidance;

- . Natural turf playing field with the design and construction in accordance with Sport England design guidance with space to lay out the following football pitches as a minimum: 2 x mini 7v7 pitches of 61 x 43 metres (plus minimum 3m run-offs) and 1 x junior 9v9 pitch of 79 x 52 metres (plus minimum 3m run-offs);

- . Floodlit and fenced (3m high) type 2 porous macadam multi-use games area with minimum dimensions of 90 x 40 metres to meet Sport England design guidance.

Sports Hub Car Parking

- . Car and cycle parking in accordance with Dacorum Borough Council requirements

Cricket Ground

- . 9 pitch fine turf cricket square and outfield area designed and constructed in accordance with England & Wales Cricket Board and Sport England design guidance;

- . Single non-turf pitch (artificial turf wicket) to accord with England & Wales Cricket Board design guidance;

- . 2 bay cricket practice net system to accord with England & Wales Cricket Board design guidance.

- . Scoreboard and scorer's base to accord with England & Wales Cricket Board design guidance;

- . Space to lay out a minimum of 1 x senior 11v11 football pitch of 100 x 64 metres (plus minimum 3m run-offs).

Community Centre/Cricket Pavilion

Minimum footprint of 553 sq.m gross internal floor area and to include:

- . Community hall designed in accordance with Sport England's design guidance;

- . 2 x team changing rooms with a minimum of 20 sq.m changing space (excluding showers, toilets and lobby areas) in each changing room plus 4 cubicle showers, 2 WCs and 2 washbasins in each changing room to accord with England & Wales Cricket Board design guidance ;

- . 1 x officials changing room (excluding shower, toilet and lobby areas) plus one WC, one washbasin and one cubicle shower to accord with England & Wales Cricket Board design guidance;

- . Separate male, female and accessible toilets for spectators/parents/coaches;

- . Clubroom/social area of at least 80 sq.m

- . Meeting room

- . Kitchen and external servery

- . Small office/first aid room;

- . Entrance lobby/reception
- . Plant room
- . Store for furniture
- . Cleaner's store;
- . Sports equipment and maintenance store (can be integral to pavilion or in a standalone building)
- . Car and cycle parking in accordance with Dacorum Borough Council requirements

The above facilities can be shared use facilities with the community centre.

Financial Contributions

- . Rugby Union: Financial contribution towards facility projects that will improve the capacity of Tring Rugby Football Club's facilities including pitch improvements, floodlighting and changing facilities. Contribution should be informed by the current capital costs associated with the demand for rugby pitches and rugby changing facilities set out in section 4 of the outputs in the attached Playing Pitch Calculator spreadsheet;

- . Hockey: Financial contribution towards facility projects that will improve or maintain the capacity of Tring Sports Centre's artificial grass pitch including surface replacement, floodlighting and changing facilities. Contribution should be informed by the current capital costs associated with the demand for hockey pitches and hockey changing facilities set out in section 4 of the outputs in the attached Playing Pitch Calculator spreadsheet;

- . Swimming Pools: Financial contribution towards facility projects at Tring Sports Centre's Swimming Pool. Contribution should be informed by the current capital costs associated with the demand for swimming pools set out in the attached Sports Facility Calculator document;

Sports Hub and Cricket Ground/Community Centre Management (full details should be specified by Dacorum Borough Council)

- . Details of tenure and land transfer arrangements;
- . Details of the facility management and maintenance arrangements
- . Community use agreement for secondary school use of the sports hub and cricket ground

Phasing

- . Provision for the sports hub to be implemented in a single phase;

- . Provision for the cricket ground and community centre to be implemented in a single phase;
- . Facilities to be implemented in an early phase to be advised by Dacorum Borough Council.

Conditions

A range of matters will need to be addressed at the reserved matter stage to help ensure that the detailed planning, design and layout of the sports facilities is fit for purpose. Sport England has model planning conditions that can assist the Council in this regard which are on our website at https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy. It is requested that the following matters be addressed as a minimum:

- Submission and approval of the design and layout of the sports hub if not required as part of a wider reserved matters requirement - see condition 9a of model conditions schedule;
- Submission and approval of the design and layout of the cricket ground and community centre if not required as part of a wider reserved matters requirement - see condition 9a of model conditions schedule;
- Submission and approval of a sports pitch feasibility study and construction specification for the sports hub natural turf playing fields to ensure that the construction and design of natural turf playing pitches is fit for purpose - see condition 10a of model conditions schedule;
- Submission and approval of a sports pitch feasibility study and construction specification for the cricket ground natural turf playing fields to ensure that the construction and design of natural turf playing pitches is fit for purpose - see condition 10a of model conditions schedule;

Community Access to School Sites

The proposed secondary school (if provided) and primary school would be expected to provide some sport and recreation facilities for meeting educational needs that could also be used by the community outside of school hours such as the natural turf playing fields and the school halls. While these facilities are principally for school use and would be designed for such use and should not be considered as a substitute for dedicated community facilities, they would offer potential to complement the proposed dedicated community sports facility provision. While there is no detail of what would be provided on the school sites, to ensure that the school's facilities are secured for community use in practice, I would request that any planning

permission makes provision for securing the community use of the sports facilities provided on the school sites. A formal community use agreement would be the appropriate mechanism for securing community use. Without a formal community use agreement being secured there would be no certainty that the facilities would be accessible to the community in practice after they have been built. Model condition 16 from our model planning conditions schedule should be used as a basis for securing this through planning permissions. Any planning permission should also make provision for full details of the design and layout of the school sports facilities to be submitted as part of reserved matters.

Active Design

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015) <https://www.sportengland.org/facilities-planning/active-design/>, a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with section 8 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments. It is also noted that section 7.4 of the Borough Council's recently adopted Strategic Design Guide SPD expects designs to adhere to the Active Design principles. It should be noted that the application of the active design principles has also been advocated by Hertfordshire County Council's Healthy Places Team (who Sport England works closely with) in their response to this planning application.

The development proposals offer opportunities for incorporating the active design principles such as the extensive walking and cycling routes that connect the residential to the community facilities and range of open spaces indicated in the Illustrative Masterplan especially the SANG to the east of the site. It is noted that paragraph 3.34 of the Design and Access Statement refers to the landscape and open spaces promoting healthy lifestyles through following the Active Design principles which is welcomed. As the planning application is substantially in outline form it would be inappropriate to provide detailed comments on the Illustrative Masterplan as this has only been submitted for illustrative purposes. The Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used in the preparation of subsequent reserved matters planning applications if the application is

	<p>permitted to ensure that opportunities for encouraging active lifestyles have been fully explored in the detailed planning and design of the development. It is therefore requested that a planning condition be imposed requiring the submission and approval of details to demonstrate how the reserved matters applications have considered Active Design principles.</p> <p>I hope that these comments can be given full consideration. I would be happy to discuss the response with the local planning authority and the applicant as the determination of the application progresses. In view of the range of issues that have been covered in the response I would suggest that a meeting takes place to discuss the issues further before any response is prepared by the applicant to the comments. Based on experience, this would usually be a more efficient way of progressing the matters for a development of this scale than multiple exchanges of correspondence.</p> <p>We would be grateful if you would advise us of the outcome of the application in due course by forwarding a copy of the decision notice.</p>
<p>East Of England Ambulance Service</p>	<p>The proposed development will put increasing pressure and demand on EEAST providing nationally set response times for ambulance emergency services around the geographical area associated with the proposed application site. EEAST does not have the capacity to meet the additional growth resulting from this development and cumulative development growth in the area.</p> <p>Any new housing development requires assessment of:</p> <ul style="list-style-type: none"> o Increasing the number of ambulances required to meet the expanded demand in order to maintain contractual response times to prevent the application of contractual fines o The suitable location of existing ambulance station(s) within the locality to meet the increased demand with potential to redevelop or extend and in certain instances relocate to a more suitable location o Additional medical equipment to manage the increased number of incidents from the growing population in order to maintain mandated ambulance response times and treatment outcomes. o The need to recruit, train and provide new equipment for additional voluntary Community First Responders (CFR) to support the proposed development and the community as a whole. <p>EEAST are in a unique position that intersects health, transport and community safety and does not have capacity to accommodate the additional growth resulting from the proposed developments combined with other developments in the vicinity. This development is likely to increase demand upon existing constrained ambulance services and</p>

blue light response times.

Table 1 shows the population likely to be generated from the proposed development. The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be £340,200.

Table 1 Capital Cost calculation of additional health services arising from the development proposal

Additional Population Growth

1,400 (dwellings) ¹	Rate ²	Ambulance Cost ³	Total
3,360	0.15	£675	£340,200

1 Calculated assuming 2.4 persons for each dwelling average household 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number)

2 Calculated using per head of population in Hertfordshire and West Essex 1996 of 1.4m and emergency activity volume in 2018/19 (203,066)

3 Calculated from EEAST ambulance data

The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth and demand generated by this development. Any funding would be used towards the capital cost of providing new additional ambulances and/or new additional medical equipment (both within and external to the ambulance), and/or new additional parking space(s) for ambulances at existing ambulance stations or if ability to expand is constrained to support relocating the ambulance station to an appropriate site to meet the needs of the existing and additional residents. In addition, capital funding could be used to recruit and train new volunteer community first responders or provide new volunteer community responder equipment.

Assessment of Development Impact on Existing Healthcare and Ambulance Service Provision

Non-emergency patient transport services are commissioned by NHS Herts CCG to take patients who meet set eligibility criteria from their usual place of residence to hospital for appointments (which may be provided in a hospital, diagnostic hub or primary care setting) in sufficient time for their appointment and then returned to their usual place of residence. As with emergency services, location and siting of PTS sites is important to meet the needs of the population.

The age profile is important for EEAST as well as the CCG, as people at both ends of the age spectrum consume a disproportionately large quantity of healthcare services and resource). Over 75s are most

likely to have multiple long-term conditions and complex care needs. Analysis of EEAST activity from 2019/20 indicates residents aged 65 years and over account for over 1/3 (35%) of Category 1 ambulance activity and 52% of all activity. Those aged 2-18 years account for 15% of Category 1 activity and 8% of all activity.

Care Homes

EEAST would request planning permission is not granted unless the following are provided as part of the S106/CIL agreement:

- a. At least one emergency lifting devices with a preference of one per floor. These inflating devices are designed to lift the frailest individual up to a bariatric patient from the floor in a safe and dignified manner minimising the risk of injury to both the fallen individual and the person lifting them. This device will enable care home staff to aid uninjured residents back into their chair/bed and thereby reduce the number of attendances from ambulance service.
- b. At least one Automated External Defibrillator should be installed with a preference of one per floor, is provided.

The measures identified in the section above are in addition to any S106/CIL funding for EEAST.

EEAST would request parking space of for at least one emergency ambulance and patient transport vehicle is provided (minimum 10.6m in length and 4m in width) ideally with 2 EV charging points Where lifts are to be installed EEAST would request these are of a suitable size to enable a patient to be safely transported by stretcher and accompanied by 2 medical personnel alongside the stretcher (a minimum internal of 2.6m x 1.6m is required).

Review of Planning Application

The change of use from agricultural land to housing will impact on emergency ambulance services.

EEAST would highlight that since the COVID-19 pandemic more people are likely to work from home for at least part of the week and room size and layout should be sufficient to facilitate at least one person working from home in a suitable environment as this supports both physical and mental health and well-being.

EEAST notes the sites are in Flood Zone 1 at low risk of flooding. The impact of flooding significantly affects residents physical and mental health in both the short and long term. EEAST together with other emergency blue light services support people when incidences of flooding occur.

	<p>EEAST would welcome the developers to utilise the catchment of clean and grey water to include underground storage tanks or multiple water butts (ie garage and house) to help reduce the risk of localised flooding post development. There is the potential for residents to reuse water for gardens, car washing and in community gardens instead of entering main sewers.</p> <p>EEAST would welcome the potential for community gardens/planting of orchard trees to support community physical and mental health and well-being. The planting and usage of communal and residents' amenity are welcomed as these can support physical and mental health and wellbeing and help develop community cohesion. EEAST supports central open spaces and would encourage the developer to consider the establishment of seating in the open spaces and along walkways to provide the opportunity for residents to meet and supports those who have limited mobility to rest.</p> <p>Transport, Design and Access Assessment of Development Impact on Existing Healthcare Provision</p> <p>It should be noted that EEAST as a blue light emergency service would request the developers support the Vision Zero/Safe System approach to design out road accidents for vehicle occupants, motorcyclists, bicyclists and pedestrians by utilising clear lines of sight, use of appropriate street/road lighting, use the of village gateways on approach to the junctions/roundabout and other opportunities to support speed reduction. The use of speed ramps to reduce vehicle speed should be limited to reduce any potential damage to ambulances, the crew and patients as these can affect the ability to treat patients during the journey.</p> <p>EEAST would request clear lines of sight are retained close to properties and walkways to support the reduction and fear of crime whilst also minimising the impact of artificial light.</p> <p>EEAST would request the developer ensures cycle parking should allow for different types of cycles to be stored (eg trike), covered, secure and well lit.</p>
<p>Parish/Town Council</p>	<p>The Council EXTREMELY STRONGLY recommends REFUSAL of this application on the grounds that the site is designated Green Belt and it is not accepted that the proposals demonstrate that exceptional circumstances have been met to release the site for development. Nor is the site included in the current Local Plan and pre-emptive. The site also abuts the Chilterns Area of Outstanding Natural Beauty. In current circumstances there is particular concern that it would cause increased pressures on the Ashridge Estate. It is over-development</p>

	<p>within a town the size of Tring. There is a floodplain by Station Road and it is unclear if the current water supply will cope with the proposed development. There is an archaeological site (Pendley deserted village). Could cause a loss of biodiversity. The infrastructure claims are entirely unrealistic saying that they will provide schools etc. that are outside their powers.</p>
<p>Urban Design (DBC)</p>	<p>These comments are in response to the revised plans and reports submitted on the 19th July</p> <p>Summary & Recommendation</p> <p>We object to this application and recommend refusal as we believe it does not demonstrate sufficient design quality, contextual response and vision for a development of this scale and strategic prominence within Tring and the Chilterns AONB. In addition to the visual harm this development would cause to the setting of the AONB, we have concerns regarding the numerous cumulative design issues within the masterplans listed in this report that have not been resolved during the design process and we believe would impact the ability of delivering a successful place and a well-designed garden community extension to Tring.</p> <p>We would consider that changes are needed to the design of the masterplan and codes to achieve a much higher level of housing quality in particular with regard to appearance, visual impact, the sustainability of new homes and delivering a successful village centre.</p> <p>Whilst we are supportive of the landscape led vision for this site which will deliver a high quality of blue and green routes and new well designed landscape proposal, we do not believe that this alone is enough to deliver a successful place in a development of this scale and there is still key outstanding issues in wider connections of the site to Tring, Bulbourne and delivering a safe route to Tring Station. We also recognise the potential active travel benefits this application could bring to the area in terms of improving the link from the station to the town centre if revised with adequate design issues are addressed.</p> <p>This is a prominent site at a strategic location which will effectively double the size of Tring in settlement floor area. We would expect the design to be exceptional in appearance and sustainability and placemaking we do not believe at present the masterplan, design code and supporting documents will support good design with a strong vision for place coming forward at the next stage in RMA.</p> <p>The key issues that form the basis of our objection are summarized</p>

below:

- Visual impact on the setting of the Chilterns AONB, green belt and settlement of Tring. Lack of design options meaningfully undertaken to mitigate this
- Poor pedestrian and cycle connections into the wider context of Tring, Tring Station and Bulborne
- Concerns over delivery of a successful village centre
- Design Codes are not of adequate quality and concerns this would lead to a low quality of appearance and hard landscaping at the reserved matters stage which would not be inkeeping with local character as well as preventing innovation in appearance, sustainable homes and best practice design
- Lack of distinction between character areas
- Lack of sustainable design principals set for delivering new homes
- Discrepancies in information provided

1) Approach to Outline Application Delivery and Design Code

The design code has been submitted for approval as part of this application and is a material consideration in subsequent Reserved Matters Applications. It therefore must ensure and encourage that the best practice in design an innovation to come forward at a reserved matters application

The design code forms the primary opportunity for recruiting delivery of a high quality place particularly given the level of detail provided with this application

There is a general lack of clarity in this design code and application in general for instance with connectivity plans not showing full comprehensive routes and discrepancies in the design code some of these have been highlighted in this report We also have concerns regarding the volume of the design code and the inability to enforce quality at the RMA stage due to large amounts of repeated information and lack of clarity to understand the vision and design intent throughout parts of the document. Whilst the precedents and sketches represent a variety of well designed and interesting places, It is hard to tell from reviewing the specific codes themselves what will make this development unique rather than encouraging generic design

We have concerns regarding lack of transparency and evidence of the process of setting stringent design code policies particularly with regards to appearance / materials. We would expect more design rigour for instance showing sample elevations (not just sketch form) to understand detailed elements such as material percentages, roof pitch and boundary conditions where these are mandatory.

The DAS also shows an in-depth contextual analysis of Tring however we do not feel as though this has been linked through in a meaningful way to the design code.

We note that there has been relatively minor pre-application engagement with officers regarding the design of the masterplan for a proposal of this scale and strategic importance. This has led to concerns regarding the level of collaboration at reserved matters stage and in our opinion emphasises further the need to secure quality during the outline stage application. Although informal discussions have occurred post submission, the primary opportunity for formal pre-application comment on the design of the masterplan was when the project was at a strategic / concept stage only with minor detailed masterplanning undertaken

We would suggest further clarification on how design quality and good placemaking would be enforced at the RMA stage. For instance we recommended competitive tendering could be used on this site to provide variety and complexity between character areas or for the village centre or would a design-led architect be retained to enforce innovation and quality.

Phasing plan appears in draft form only and misses out the delivery times of key connecting roads, public realm and greenspace. We are unclear from this plan as to when the landscape improvements to the SANG are being delivered as they are not demarked. We would suggest it is necessary to include these with earlier plot delivery to provide a accessible green space to the first residents to move in. Plan should be revised to include.

2) Context, Character and Setting of Tring

The market town of Tring is the 3rd largest settlement in the Borough and has been identified as a key area for growth in the Emerging Core Strategy. The settlement including Marshcroft Site is positioned at a low point in the Chilterns Hills making it highly visible in views from the AONB which sits adjacent to the boundary of the site on 3 sides of the redline boundary. Tring has a backdrop of architecturally rich buildings typical of the Local Rothschild Style and town centre with numerous buildings of character which is stated within the Tring Conservation Area. The listed Pendley Manor Estate sites adjacent to the site though is buffered by heavy tree coverage

The historic town of Tring and surrounding landscape of the Chilterns, Tring Gap foothill and Aylesbury Vale is particularly well visited area in the Borough for both Dacorum residents and further afield due to the AONB and local attractions such as Tring Park and the Ashridge

Estate. Due to both this prominence sitting within adjacent to the AONB an area of Dacorum that is visited for beautiful landscape and attractive historic character we would place a high emphasis on the need for the highest quality of beautifully and imaginatively designed homes and landscape which enhance and do not harm both the setting of the historic market town of Tring and add visual interest to the area when viewed from key walking routes and the surrounding landscape.

Whilst falling outside of the Chilterns AONB due to being part of the larger settlement of Tring. The site is abutted on all 3 sides and visible from key landmarks in AONB such as the Ivinghoe Beacon.

The Chilterns Design Guide and Chilterns Area Management Plan sets out the below guidance with regard to using guidance principals for adjacent settlements located within the AONB and therefore we have therefore given due prominence to the design guidance set out whilst reviewing the Marshcroft Proposal.

The impact of settlements and development adjacent to the AONB:
2.32 Development pressure in surrounding towns is considerable and some of this will inevitably have an impact on the AONB itself. The boundary of the AONB is deliberately drawn to exclude many large settlements such as Henley-on-Thames, High Wycombe, Amersham, Berkhamsted, Dunstable and Luton, because of their size and urban character. Excluding them from the AONB does not, however, mean they do not have an impact on the designated area. In most cases there are extensive views from the AONB, especially from the scarp ridge and valley sides, across neighbouring towns. The development at the former cement works at Pitstone, the Wendover bypass and housing estates around High Wycombe are all examples of how the views from the Chilterns can be affected.'

2.33 This guidance should also be used in connection with proposals for development outside the boundary which may have an impact on the AONB and its setting.

In addition to conservation & design officer's own assessment of the site and surrounding character of Tring, we have used the following local design policy and guidance documents to inform our understanding regarding local character and appearance of buildings in the area:

- Tring Conservation Area, Character Appraisal, 2018
- Tring Urban Design Assessment, 2010
- Chilterns design guide
- Chilterns area management plan

- Dacorum Local Plan – Emerging Strategy for Growth 2020-2038

We also note requirement in DBC Emerging Strategy for growth in relation to the development appearance

23.140 'Growth at Tring will also need to be sensitive in its design and landscape to the surrounding landscape and heritage context, including the Chilterns AONB, and protecting and enhancing the market town attributes of the town centre, including its shopping and service role'

Comments made on appearance and design throughout this report have taken delivering a design that is sensitive to Tring and its landscape this to be of high importance in relation to delivering homes on this draft allocation site and believe due importance should be placed on achieving a contextual and strong design code to achieve this

3) Impact on Greenbelt & AONB

Visual Impact of development

We make reference to and are in agreement with the consultation response from HDA's assessment of the LVIA submitted and visual impact of the massing development on the landscape. The key areas of concern relevant to design we note from the report are summarised below

- High overall adverse Impact on the setting of the AONB
- Wireframe Photomontage 1 – demonstrates that the proposed development (and mitigation planting) would block existing views of the Chilterns on the skyline.
- Wireframe Photomontage 2 – Demonstrates that the proposals would noticeably extend the settlement edge of Tring, particularly to the south. Note: the modelled development appears to extend beyond the south-eastern boundary. Check referencing of wireframe model.
- Wireframe Photomontage 3 – Demonstrates that the proposals would noticeably extend the settlement edge of Tring, particularly to the north. The retained agricultural fields to the north-west of the site are noticeable within the view.
- In order to assimilate the development better into the landscape in views from the Chilterns, stronger landscape structure within the development area particularly with a north-south trajectory.
- Test additional scheme massing iterations within the wireframes
- Stronger landscape structure within the development area

particular with a north-south trajectory

- Additional structural /tree planting to mitigate impact of the development
- Increased landscape along primary corridor of site

In addition to this we make the following observations regarding parcel design on wireframe views:

- We would suggest that the LVIA views need to accurately represent the variation in heights as set out within the design code. At present the wireframe views are showing the majority of heights at the maximum 3 storey limit however majority of the site is being delivered at 2, this could be done through detailed adjusting of height zones or showing massing illustration of the quantum of area

- P1 ProW Grand Union Canal Walk: Prevailing height of 3 stories causes a block / wall of development when viewed from the Public Right of Way (should be adapted to accurately reflect design codes heights). We recommended this should be dropped to 2 stories with increased gaps between development plots so that the ridge line of Tring Park can be viewed from the Pathway.

- P2 Pitstone Hill Ridgeway, The Chilterns: Station road SE plots should be reconfigured to provide a wider band of greenspace from this view to respond to the existing open and rural character of site. Additional tree screening should also be provided to this area of the masterplan

- P3 Ridgeway Wigginton Hill, Chilterns AONB: Concerns over this views with development currently reading as a large mass and bulky– suggest increase in trees bands to be planted between plots to assist in breaking down the masterplan and tree screening to development edge.

We would recommendation the following as revisions to mitigate the adverse impact on Tring and AONB

- Development plots parameter plan could be adjusted to setback parcel edges along corridors running N/E – S/W of site. This would allow for additional tree planting and open space and would mitigate the ‘wall like’ appearance of the development as shown in wireframes P1 ProW Grand Union Canal Walk and P2 Pitstone Hill Ridgeway

- Planting mature trees from early phases of parcel delivery would significantly lower the impact of the development within the landscape context. This is particularly relevant for close range views

such as View 1 from the Grand Union Canal Towpath which shows the development being highly prominent in views from year 1 but screened with tree planting by year 15. We suggest that this time period should be significantly reduced to provide early visual buffering to the developments soft landscape edges.

- LVIA tests height parameter only – we would suggest that this should follow the more nuanced heights set out within the design code for a true picture of the developments impact.

- We would suggest that this level of harm to the visual experience and character of the Chilterns AONB setting is unacceptable with the current masterplan layout and should be reviewed. This could also include additional wireframe or massing views recommended in the landscape consultant's report to support any iterations made to the layout.

Heights

We support the general approach to proposed building heights in the design code and believe them to be aligned with similar heights of buildings in Tring which is predominantly 2 storey with some 2.5/3.

As illustrative site sections showing levels have not been included we would suggest wording in all parameters / codes should be phrased as 'up to Xm' to allow for discussion regarding the impact that sites levels with have on the building heights when detailed site sections showing levels and relation to height of adjacent buildings would be submitted as part of a RMA.

The parameter plan and code have discrepancies between the height limits which need to be adjusted for clarity. The parameter plan sets out Primary School at 11m and Secondary School at 10m and 15m. This does not appear to match heights set out in design code which states school to be 'up to 12m'. The community building heights (up to 12m) also clash with the height zone in the parameter plan (3 stories up to 11m)

The village centre code doesn't set a height limit for 2.5 – 3 storey dwellings - of which the character area is predominantly made up of

4) Masterplan & Site Connectivity

There are several outstanding issues listed below regarding connectivity on the development site into Tring, Bulbourne and the Station Road. We note Manual for Streets guidance on masterplan movement frameworks and the need to resolve these at the design

code and masterplanning stage prior to moving on to detailed design

The way streets are laid out and how they relate to the surrounding buildings and spaces has a great impact on the aesthetic and functional success of a neighbourhood. Certain elements are critical because once laid down, they cannot easily be changed. These issues are considered in the masterplanning and design coding stage, and need to be resolved before detailed design is carried out.

New Mill Site

Dacorum Emerging Strategy for Growth 2020 sets out below requirements in relation to the Tr02 New Mill Site.

'The allocations Tr03 East of Tring and Tr02 New Mill should be planned together, preferably as a joint plan or as a minimum through closely aligned masterplans taking an integrated approach to the joint site area. Ensure high quality green and blue infrastructure and sustainable transport linkages are provided with the adjacent allocation Tr02, including to the new community hub, local centre and primary and secondary schools'

We note the lack of comprehensive engagement with adjacent site during the masterplanning process and have concerns regarding developing this area of masterplan occurring without a closely aligned approach with Tr02.

We do not feel as though the masterplan is well connected into the existing community of Tring at present and would suggest additional connection needs to be made into the central High Street and Village centre of the development to encourage walking and active travel both to and from Tring and discourage car use.

Delivery through the New Mill site provides this opportunity as was discussed in the early version of the masterplan at pre-application stage and we consider an essential element of the active travel network in delivery an site of strategic importance and growth that does not encourage car use. We are concerned regarding the removal of the 3 walking and cycling route through the New Mill that was shown to officers on early versions of the masterplan

Plan shared with officers during pre-application stage – highlighting additional connection to town centre via Tr02

Connectivity Parameter Plan July 2022

Given the lack of engagement with site owners included in this

application or indicative masterplan shown on the Tr02 we also have concerns regarding the setting of the north western development parcels up against the redline boundary of the site as this could impact the viability on Tr02 coming forward due to need to setback from this frontage and particularly as this site is smaller in area so will be more constrained. As per comment above it is also important to allow space for a pedestrian route to be delivered here which could run along the boundary sites and provide a connectivity between the two developments.

A pedestrian route running along the development edge of the Bulbourne Road should be included in the delivery of this masterplan running along the edge connecting the development to the garden centre and the village of Bulbourne. This could sit behind the sites boundary as there is a constraint of mature vegetation. This is mentioned in the framework travel plan but not shown as a route in the parameter plans or masterplan design

Delivery of a safe segregated cycle route to Tring town centre would be hugely beneficial in reducing car use across this development and was part of the early project strategy. This does not seem to have been explored as a serious option within the Active Travel Framework provided or wider urban design analysis of site.

The regulating plan shows pedestrian and cycle links as 'indicative' we suggest this wording should be changed to 'indicative location' to avoid confusion on key routes not being delivered at a later stage

Response to Station Road Frontage:

Additional plot frontage is welcomed to provide a safe and overlooked active travel route to the station this was also a theme to emerge from the public engagement undertaken with the project development. However previous concerns raised regarding character and permeability of this frontage do not seem to have been picked up in the masterplan submission

Previous comments from officer related to concerns regarding response in the masterplan to maintaining an openness and sense of green space regarding increasing green spacing between the development plots in the parameter plan having not been picked up. These would allow for glimpsed views through the development to the SANG maintaining the sites green and open character. We also note the emerging allocation brief for and 'a buffer of open space along Station Road' and policy in Dacorum's policy CS10 adopted Core Strategy 'b) reinforce the topography of natural landscapes and the existing soft edges of towns and villages' in relation to this. Whilst the

allocation brief does not recognise the constraints of delivering a safe and overlooked frontage which is key to delivering this development sustainably, we believe more could be done to increase an open space character along this frontage to provide a sense of a continuation of a green buffer. This would also assist in setting back development from the frontage of Pendley Manor

Previous comments have been made regarding increase of green buffer space to improve open edge, link with SANG and response to Pendley Manor Estate and increase permeability of walking and cycle route along station rd through showing of an additional indicative connection between the rd and site edge

In response to delivering a safe and overlooked route, we have raised previous issues regarding permeability of the walking and cycling route along station road. At present we do not think it is acceptable for the masterplan only shows 3 connections being delivered along the station road and a long length of unconnected ped/cycle route (measured as over 500m) which is not well overlooked. We would suggest that an minimum of 1 - 2 new pedestrian / cycle connections should be delivered with this masterplan . Whilst we understand the related issues with mature trees and levels expressed by the applicant team, however we believe that this should be worked around as a design constraint to achieve a well connected layout.

We note Manual for Streets on best practice guidance in delivering sustainable and safe active travel routes – 4.6.3 Safer Places..there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;’

We suggest this route should align with the existing bus stop which is at present not well connected to the development or as a gateway space into SANG opposite the Pendley Manor Entrance and a short walk to the bus stop

We do not support the mandatory design principal set out in the code of ‘consistent spacing with narrow gaps’ running along this frontage as would be out of character with the general context of dwellings along Station Road which would have larger gaps and are more open in character. Whilst we support a continuous frontage and use of denser typologies such as small terraces or well designed courtyard blocks along this street for reasons of overlooking and safety we would recommend that these are split up with generous gaps and open green space between sets of buildings that will not adversely impact on the open and natural character of this edge and proved opportunities to show the landscape edge merging into the built form

Whilst we note the heavy tree coverage along this edge which will play a role in mitigating this development – coverage is sparse in winter months, as shown in below street view from April 2019 from Station Rd

Apartments with balconies would assist in providing increased overlooking along this edge. This would also make sense in providing a higher density of dwellings which are close to walk to the station, more could be done in the code to incorporate as a mandatory design principal

We question if setting a mandatory principal of 1.8m high walls at gatehouse blocks (Mandatory principal 9.5) is an appropriate design code for a frontage in which overlooking is needed to provide a safe and active route. More clarification should be added on how these will not provide large amounts of dead frontage in important pedestrian links such as along the station road

April tree coverage along station rd frontage

Village Centre:

As raised during pre-application discussion we have concerns regarding the design principals of the Village Square public space which is the central space in the development providing a civic and community heart and part of the project that we see as a key space to be delivered to provide a meeting point and sense of community. We note Building for a healthy life 2020 design guidance on delivering public spaces and squares in new developments

Create places where people can meet each other such as public spaces, leisure facilities, community buildings, cafes and restaurants to provide opportunities for social interaction – helping to improve public health by encouraging physical activity and helping to tackle those affected by loneliness and isolation

(what green looks like) Giving places where routes meet a human scale and create public squares

(what red looks like) Local centres that are not easily accessible and attractive to pedestrians and cyclists

Despite the illustrative material showing a public space being surrounded active mixed-uses at the ground floor the design codes state that the square can be delivered with large amounts of car park use integrated instead of a core public space, we do not see this as a good design principal to safeguard delivery of a high quality public

civic space. Of particular concern are the mandatory design principals in the code listed below:

Mandatory Design Principals for Village Square:

5. Parking for visitors to the commercial units should be well designed and integrated within the Square.

6. The different components that make up the Square - carriageway, pedestrian paths, cycle way, parking, street furniture - should be held together by an attractive grid of street trees and pavement design.

8. 3. Parking for the retail and community facilities shall be provided within the Village Square. They shall be well-designed and integrated into the public realm with high quality streetfurniture and planting. Access options for delivery and servicing of the retail and community facilities shall be integrated within the public realm design.

As discussed with the applicant team during a meeting in July regarding the design code, we understand the requirement to maintain some flexibility if for example a health centre was to be delivered at RM which would require additional parking bays. We don't however believe that this should come at the expense of a key public community space and would suggest that additional area could be found through reducing the amount of dwellings or reducing footprint larger houses in the surrounding areas of the masterplan.

We believe that delivery of this public space is key to this development and will provide a central space for the community to meet supporting the local centre and school which face the square and providing a framework for healthy and active living, supporting community and reducing loneliness. Although substantial green spaces are being provided within this development we do not believe these replace the function of a public square / space more urban/civic in character

We strongly object to allowing car parking to be delivered within the main public space in the development as a mandatory principal and note the following in relation to the delivery of a successful public square:

- At present the amount of parking required for village centre is not dictated and would be liable to potential uplift at RMA potentially impacting on the delivery of a well designed public space if needing to be increased for a development use for instance a health centre

- Area in the masterplan should be safeguarded for public space only without the introduction of car parking allowed at detailed stage to ensure delivery of a public square is not compromised

- The area for the square shown for the Village Square public space in the illustrative masterplan and design code at present looks adequately sized for a community square in a development of this scale. We have concerns over the lack of integrated car parking shown in the public space in these images as it is misleading as would likely contain large amounts of car parking bays

- We support what is shown in the illustrative masterplan as a car parking layout for the Village centre, which shows car parking bays integrated on the street outside of shops rather than within the public space

5) Appearance & Materials

Primary Façade Materials - Use of Redbrick

As commented previously we do not support the approach to mandatory materials taken across this masterplan and have concerns regarding it not been in keeping with the character of Tring and the local area. As discussed previously also have concerns regarding the lack of elevations or design led evidence base showing how the team arrived at the materials and appearance codes particularly in terms of setting the mandatory percentage of materials to be delivered in elevations and roofing which appears arbitrary without elevations or 3D visualisations to support the code.

We agree with and support the character evaluation work (DAS 7.56) that the design team has undertaken regarding prevailing architectural character in Tring also supported with what set out prevailing materials in the Tring Conservation Area Appraisal and Tring Urban Design Assessment SPD.

‘Architectural style and materials is the most distinct element that makes up the character of a place. Red brick, terracotta tiles, flint, clay roof tiles are some of the key building materials associated with Tring.’

We note Tring UD Character assessment in relation to primary brick materials and roofing

‘The town centre is made of predominantly high quality brick buildings. Traditional brickwork should be favoured over modern wirecut bricks. Clay tile or slate roofing material should be encouraged. A broad stylistic approach should favour front facades, generally parapeted terrace buildings, over the visibility of pitched roofs.’

‘The inner zone buildings are predominantly brick buildings. The closed route zone buildings are a mix of brick buildings and

buildings with a range of different sidings, including wood, clay and slate. Brick buildings were generally preferred by the local residents consulted. The peripheral zone buildings are generally brick buildings, and brick buildings that utilise traditional brickwork would be recommended.'

We have concerns that these principals have not been taken through into the design code which specifies an average of 45.8% of red brick to be used in elevations across all character areas. We consider this to be low in relation to the existing character of Tring. Whilst we would not necessarily expect this to be raised across every character area as could appear monotonous we would expect more allowances for a higher proportion of red brick in the development in general or focusses on certain zones such as the village centre

Mandatory Design Codes – Wall % to be delivered across the character areas

Garden Suburb Core 40% Red brick / multi red (with remainder as buff brick, brown brick, brown multi-brick, flint, off white render)

Village Centre 45% Red brick / multi red (with buff brick, flint wall and render)

Outer Garden Suburb 50% Red Brick / multi red (with buff brick, tile hanging walls and off white render)

Village Edge 40% Red Brick (buff brick, tile hanging, timber boarding/ceder shingles, flint walls and off white render)

Orchard Quarter Timber boarding / shingles 60% (with red brick, multi-red brick, buff brick and off white render)

Station Road 40% Red Brick (with buff brick, multi brock, tmiber boarding, timber shingles and off white render)

Average 45.8% across the development specified in total

The restrictive nature of the percentages set of redbrick in the character areas would undermine the delivery of houses with red brick as the primary cladding and detail such as thoses shown on the below elevations (and throughout the document) and found frequently on some of the higher quality listed buildings in Tring town centre & Conservation area. This would lead to the red brick % being quickly 'used up' in character areas and the remaining primary materials to be delivered as buff brick, brown brick or white render. We would suggest there should be some increased flexibility here to allow for more red brick as the primary cladding across certain character areas with detailing more in line with local character.

Design code typologies

Assuming the approach to materials is as per set out in the previous

iteration of the design code (where percentages were set amounts and added up to 100) we would suggest that materials could be set as a minimum rather than a specific amount to delivery. This should also set aspirations on delivery of higher quality local materials such as flint. We would also recommended that the overall percentages of red brick and brick should be increased to allow flexibility in primary material across the site. This could be done to distinguish certain character areas (by increasing red brick %) which would assist in adding variety of the masterplan. We would also suggest a clarity note should be added to the code on how the materials will be enforced / reviewed at RM it is unclear at present

Whilst we understand that these are only illustrative – we note that some illustrations such as the station road elevation – appear to show more than the specified percentage of red brick for the character area. (40%) which we believe is misleading.

We also note that the materials codes for Orchard Quarter (60% timber boarding and shingles) clashes with the mandatory wall design code (below) which says that brick or render as primary material. This needs to be adjusted to allow for the Orchard Quarter primary materials.

Primary Façade Material - Use of White Render

Mandatory Wall Codes – Applies to all character areas

2.1 .A maximum of two materials should be chosen for exterior walls of any given building, with brick or render as the primary material covering a major proportion of the wall material

Whilst we recognise white render / render is a material used locally in the context of Tring, we do not support that it is used as commonplace primary wall material particularly when reviewing buildings of architectural merit and local character such as within the High Street Area. There are a number of buildings which feature white render areas of wall however this is often used in combination with timber framing and render infill panels or on feature buildings. In addition harl wall finish is also used which adds more texture than typical render

As commented previously we would not support large amounts of white render being delivered as the primary façade material on houses across this site in particular unless heavily limited within certain character types.

5/6 character area materials code allow for off white render to be used

as the primary façade material other than the red brick. There is no restrictions on the upper limit which could mean in theory around 55% of the site could be delivered as the white render

White render does not generally weather well and needs frequent upkeep to remain in good condition and appearance. We note DBC Strategic Design Guide SPD in relation to the need to provide low maintenance and high quality materials across the development. '5.9.1 Designs should demonstrate: Use of materials that are high quality, longlasting and low in maintenance and sustainable. (DBC strategic design guide)'

We also note the visual sensitive of the site and its location within the AONB. White coloured render tends to be highly visible from the landscape due to high contrast in material tone. We would have concerns regarding the impact of development on views if it was to be delivered in large amounts (which the design code currently allows for)

As suggested previously we would suggest render being limited to accents and smaller areas of detailing only and/or limiting its delivery in select character areas to ensure it is not used as a primary across all character areas.

All character areas allow for white render to make up the remaining percentage which as commented we would not deem acceptable. We suggest an acceptable predominant façade material across the development should be brick, with some variation between character areas to add variety and interest. This would also aligns with the predominant character of materials in Tring and the Chilterns AONB (as set out in previous chapter)

We note development policy DP7 set out in the Chilterns Management Plan 2019 - 2023 regarding only supporting development which is 'of the highest standards of design and respects the natural beauty of the Chilterns' this house has been provided as an illustrative image to policy DP7 as being 'insensitive to the AONB stark, white huge and angular this replacement dwelling viewed from the Chilterns cycleway dominates the landscape in its siting and design'

Village Centre and Square - Design of Buildings

Design Code Village Centre '9.5 The educational and community buildings located on the east of the central area represent the opportunity for contemporary design and material selection to create unique buildings within the overall village development.'

Whilst we support the following principal to apply to buildings in the village centre, we see the related materials palette for the area (Brick buff/red, flint wall and render) as being highly restrictive in terms of the design of public and educational buildings where we would be looking for exceptional design and innovation to create a sense of place and identity in the heart of the new community. We would suggest that this code should not prevent this being delivered and in the case of application to public buildings should be more flexible to include materials such as ceramics, stone or metal panelling or encourage more sustainable materials such as timber. We also note the mandatory code for dark grey windows across the entire character area and believe that this could appear monotonous and dark partially with regards to public building design.

Lack of distinction between character areas

The scale of this sites area in relation to the size of the town (set out below) is substantial and constitutes almost half of the built form of the town which will result in a huge change in overall character to the current area. We would expect the masterplan on this site to be defining strong character areas which whilst being in keeping with the general character of the area have clearly defined differences in appearance. This will support the general settlement character in Tring which has numerous areas of smaller scale historic expansion rather than appearing as a homogenous mass of development which will cause substantial harm to the character of the settlement.

Therefore to be in line with the context - setting design aspiration for a strong and clearly defined character areas is of upmost importance on this site as character will come from the complexity. We note the below from the Tring Conservation Area Appraisal Regarding reference to the diverse character areas found within the town centre

‘the underlying architectural and historic character of the town is diverse, although almost all post-medieval. Its predominantly early-nineteenth-century appearance belies its mixed architectural heritage.’

Achieving a varied and un-generic development with clearly identifiable character areas is of up-most importance for creating a sense of place to residents and for breaking down the development in longer views. At present we have concerns regarding the large amounts of overlap in materials between the character categories and if an interpretation of this would lead to character areas which do not have distinct differences in character. Given the length and detail in this design code, the approach does not feel well thought out and the appearance codes are open to interpretation at RM stage. We note

design guidance regarding decorative detailing (points 2/3 in the walls character area codes) which would distinguish the areas from each other and add character is only listed as optional.

The character area coding is not clear in the design intentions with regards to appearance. Whilst the precedents images show variance we would expect the codes themselves which will be a material consideration at reserved matters to clearly code the principals for the appearance rather than leaving open to interpretation therefore not being able to enforce character and design quality at a later stage.

There is a lack of codes to encourage the higher quality types of building material and detail - for instance regarding use of flint (a high quality and local material found in Tring and the Chilterns AONB) we would be expecting one or two character areas where appropriate to clearly state that this must be used in the façade of buildings in this zone. Currently at RM the development would not have to provide any flint or more bespoke materials and details whilst working from an compliant interpretation of this design code.

Roof Design

Roof materials as set as mandatory red/brown tiles and grey tiles across the entire site (Code 8.29)

As commented previously we are concerns over codes which prevent the delivery of green and blue roofs or well integrated roof gardens into homes across the development. Whilst green roof is not a typology used frequently in the area of Tring, it can be found in well designed development in the Chilterns in general such as the award winning local Tring Park School and also frequently in other well designed sustainable housing developments .

Tring Park School

Green roofs bring around numerous sustainability benefits in terms of improving biodiversity, slowing the rate in which water reaches drainage systems and opportunities for a natural cooling effect on homes through water evaporation. We note the organisation Living Roofs report in realtion to benefits of green roofs in addressing the climate crisis. (<https://livingroofs.org/wp-content/uploads/2019/04/LONDON-LIVING-ROOFS-WALLS-REPORT-2019.pdf>)

In addition to this we believe that use of sensitively located green roofs (most likely appropriately located in the centre of the development where it is not meeting an existing residential street in

Tring) could be beneficial in reducing the visual impact of the development when seen from longer views from the AONB due to creating a effect of blending into the landscape.

The only reference to green roofs in in a photo reference encouraging consideration for communal buildings, this however clashes with earlier general code on mandatory roof materials. Not having flat roofs as a roof type particularly will restrict the use of green roofs as they are typically easier to deliver on flat areas of roofing.

As commented previously we would expect more sustainable materials such a green roofing to be allowed as options for subsidiary buildings such as garage roofs or bike stores. The code – ‘garage roof materials must be co-ordinated with those of the principal building’ also restricts reducing visual impact of potentially bulky garages in a landscape sensitive location (as is coded to be pitched with tiles) and prevents more sustainable construction techniques from being used

Other:

Mandatory codes for materials 8.2.9. specify palettes for balconies however do not specify any ironmogrey or glass as an allowed material. We would recommend this should be added in addition to the brick as can bring around benefits in daylighting, permeability and design variation when integrated sensitively into the elevation

The boundary condition codes for all types other than rural edge are very restrictive in what can be delivered and do not encourage variety or increasing biodiversity across the development. At present majority of street facing boundaries are to be brick wall, metal railing and formal hedge. We suggest there could be more opportunities here for options such as wildflower planting or informal hedges / shrubs as is shown in several of the precedent examples. We note Building for a Healthy Life Guidance in relation to best practice for this ‘Boundary treatments ‘(should) add ecological value and/or reinforce distinctive local characteristics’

6) Sustainability & Addressing the Climate Crisis

There is no inclusions of neighbourhood energy approach such as joined up district heating networks or energy centres which could store renewable energy which has been generated on site. We feel like this is a missed opportunity in the design of a development of this scale to tackle the climate crisis and appears to be ruled out in the Energy Statement without detailed design work undertaken/provided. We also note Dacorum’s Strategic Design Guide SPD in relation to energy generation approach on large developments. 8.7.2 For large

developments, incorporation of sustainable district heating and power networks (CHP) where this is an appropriate solution, and community energy schemes. Marshcroft is one of the largest housing sites in the Borough and we feel this should be explored further to deliver a sustainable development

Whilst we support the use of PV panels across the site – we note that these will be of high visual impact in views from the Chilterns AONB and therefore the benefit in the Energy Statement stated below may therefore be overstated once detailed design PV roofscape and view analysis has been undertaken.

12.4.5 Residential designers must seek to optimise useable roof area for PV (as also bulleted in Section 10.1) and this requirement is reflected within the Design Code document

12.4.8 Overall, estimates for the proposed use of roof mounted PV across the site are expected to reduce residual emissions to levels significantly beyond the 20% emerging policy expectation

There could be opportunities to set principals of delivering a set % of passivehaus accredited homes and public buildings across this site or a well thought out MMC scheme that optimises resources and construction time. Lack of vision set out in the design code regarding delivering a sustainable design on site that can also address the cost of living crisis on new homes.

No referenced in sourcing local bricks from the Chilterns area

No green roofs allowed for on housing (communal buildings only) we feel this is a missed opportunity on a development of this scale and would also address some design concerns regarding visual impact

We would suggest permeable paving used on residential driveways to reduce the potential for flooding on site particularly as the area of hard landscaping will increase. The wording on the hard landscaping palette is not particularly clear or strong in setting an intention for this '5. Contribute to the surface water drainage system across the development, including permeable surfaces where appropriate'

Relevant Policy and Guidance

- Dacorum Local Plan – Emerging Strategy for Growth 2020-2038 (with particular reference to Tring, Proposals and Sites)
- Dacorum Core Strategy 2006 – 2031 (CS4 Towns and Large Villages, Chapter 10 Securing Quality Design, CS10 Quality of Settlement Design, CS11 Quality of Neighbourhood Design, CS12

Quality of Site Design, CS13 Quality of Public Realm, 14.1 Providing Homes, CS29 Sustainable Design and Construction, CS24 Chilterns AONB)

- Dacorum Strategic Design Guide SPD
- Dacorum Urban Design Assessment Tring SPD 2010
- Tring Conservation Area Appraisal 2018
- Chilterns AONB Management Plan
- The Chilterns Buildings Design Guide
- The Chilterns Buildings Design Guide – Supplementary Technical Note Chilterns Brick
- NPPF 2021 (in particular reference to paragraph 134 and in addition 92, 110, 112, 126, 127, 130, 132, 134, 154, 177)
- Building for a Healthy Life 2020
- Manual for Streets
- National Design Guide
- National Model Design Code
- TCPA Garden City Principals

FURTHER COMMENTS RECEIVED 27.09.22

These comments and recommendations are in response to the amendments to the design code and masterplan submitted on the 09th September and should be read with original response (attached).

Summary:

- We support the changes relating to materials which included removing the % cap on use of brick in the character areas and reducing the amount of white render across the site. As per previous comment - we still have concerns regarding inclusion of white render in all character areas as this is a highly visible material when viewed from a landscape context. We would support inclusion in 2-3 areas

- We support that green roofs have been included as a roof typology for the masterplan to encourage sustainable buildings and support with integration the scheme into the landscape. We however think the code for this is still limiting and as per previous comment would suggest should be expanded to include garages and outbuildings and other housing character areas.

In addition to previous comments - we note the following which we believe to be key outstanding issues with the outline proposal

- No alterations have been made on comments based on the LVIA from C&D and Landscape Consultant regarding increasing the area of green corridors between plots to break up the masterplan and mitigate the impact on views from the AONB. No response has been

made regarding comment about tree maturity

- Place making comments on village centre square have not been picked up regarding providing a public space that is free of car parking and design codes being restrictive architectural innovation of public buildings

- We have concerns regarding the pedestrian and cycle connectivity proposal to support this application. As previous comment, the framework plan is poorly connected along the Bulbourne Rd, Station Rd and into Tring town centre. The framework plan shows indicative public realm network in a large amount of detail and has been included within this application 'for approval' so we have concerns that intent for these connections is not been included

- Lack of development buffer and connections into the Tr02 New Mill Site in the parameter plan. We note buffer zone is included on all other site edges that abut adjacent development - we have concerns over restricting the masterplanning of this site

- Despite previous comment white render is still included in buildings across all character areas which will be highly visible from AONB. We do not support this as an approach

- As per previous comments we still have concerns over some of the design codes restricting innovation in design and sustainability

Recommendation:

We do not support the design of this application in its current form, the masterplan proposal still requires design changes to be made to ensure the vision for this site is delivered, in particular appearance, layout impact on views from the AONB, positive place making in the village centre and achieving a well-connected site. The design code has been submitted for approval as part of this application and is key to setting the vision and level of design quality across this site and we suggest should be updated to include changes within this report.

We note that the applicant has not responded on any of the other design and conservation concerns issued previously on the methodology and design process for setting out delivering a high quality and sustainable design at the RMA stage.

Should this application be taken forward, we recommend that the imposition of below conditions in the approval would mitigate some of the outstanding design concerns and ensure quality is delivered on a large strategic housing site. This is with particular regard to appearance, visual impact, good placemaking and public realm

Recommended Conditions:

1. Proposal should be subject to a minimum of 3 Quality or

Design Review Panels at the RMA Stage

Programme for this should be discussed and agreed with officers during the RMA pre-application process. Full DRP/QRP reports should be appended to the planning application when submitted along with a response from the applicant team on how the feedback has been addressed in emerging proposals after each review

The focus of the review sessions should address and/or be themed around the areas below which are fundamental to delivering a successful place and community and a high quality design that contributes positively to local character

- o Design and vision for the Village Centre - including a review of the public realm proposal for the Village Centre Square
- o Review of the architectural interpretation of the character areas - this should focus on the design of elevations, appearance & character of buildings and sustainable construction
- o Public realm framework - with a focus on walking and cycling and wider connections

2. We would suggest a condition that a Building for a Healthy Life assessment to be submitted to support this application at the Reserved Matters Stage. This will ensure that the parcel layouts and wider masterplan coming forward are well integrated, distinct and inclusive for future residents.

3. As set out in comments, we have concerns regarding some of the key mandatory principals regarding the design of the village centre in particular the relationship between public realm and community space with car parking. We suggest a landscape plan showing the key principals for the concept for the public square is produced and key principals agreed with officers prior to application submission. This will allow for further

4. Given the lack of 3D massing included with this application - we would also suggest it is of importance for 3D massing views and visual images to be evidenced during the reserved matters application. This should be discussed with officers in pre-application stage and should include street scenes and key views from public footpaths particularly from within the AONB

5. We have concerns around a design code allowing use of white render on all buildings across all character areas in the masterplan. We believe this would cause visual harm in views from the wider landscape and negatively impact on the setting of the AONB. We would suggest a condition to limit the use of white render to a

	<p>maximum of 3 character areas only or 2 if the Garden Suburb Core is being included - which is the largest character area.</p>
<p>Herts & Middlesex Wildlife Trust</p>	<p>Small changes to species lists and management required. Condition for a biodiversity net gain management plan required to secure habitats outlined in the approved metric. Hedgerow provision required offsite or via a S106 to deliver a 10% net gain in linear habitats. Condition required for integrated swift and bat boxes required.</p> <p>Changes are required to the management of proposed habitats to achieve the intended results.</p> <p>The Landscape and Biodiversity Management Plan should be altered:</p> <p>Remove London Plane from the tree planting mix, it is not native. Remove Scots Pine, not appropriate for this area.</p> <p>Hay meadow management involves cutting and clearing twice a year in mid July and October, not once as has been stated. Change Table 5.7 p24 to reflect this.</p> <p>The biodiversity net gain metric shows an acceptable net gain in terrestrial habitats but not in hedgerows. There should be a 10% net gain in hedgerow habitat. If this cannot be delivered on-site it should be provided offsite or via a S106 agreement with the LPA to deliver it on their behalf.</p> <p>The outputs of the biodiversity metric should be secured by a suitably worded condition. This must require a biodiversity net gain plan that demonstrates how the specific habitat units detailed in the metric will be achieved. The plan should link directly to the metric with the number of units explicitly stated for each habitat parcel, together with the establishment, management and monitoring measures required. Contingency in case of failure must also be detailed. A suitable condition is:</p> <p>'Development shall not commence until a Biodiversity Net Gain Management Plan (BNGMP) has been submitted to, and approved in writing by, the local planning authority. The content of the BNGMP shall ensure the delivery of the agreed number of habitat units identified in the approved NE biodiversity Metric (insert unit total here) as a minimum to achieve a biodiversity net gain. The BNGMP must include the following.</p> <p>a) Description and evaluation of features to be managed. b) Aims and objectives of management. c) Appropriate management options for achieving target condition for</p>

	<p>all habitat parcels as described in the approved metric.</p> <p>d) Prescriptions for management actions, only definitive measures are acceptable.</p> <p>e) Preparation of an annual work schedule capable of being rolled forward in perpetuity, with habitat land parcels clearly marked on plans.</p> <p>f) Details of the body or organisation responsible for implementation of the plan.</p> <p>g) Ongoing monitoring plan and remedial measures to ensure habitat condition targets in the approved metric are met.</p> <p>h) Details of species selected to achieve target habitat conditions as identified in approved metric, definitively stated and marked on plans.</p> <p>The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.</p> <p>The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.'</p> <p>Reason: To achieve a measurable biodiversity net gain in accordance with NPPF.'</p> <p>All houses bordering open space should incorporate an integrated swift and bat boxes. The following condition should be applied to secure this:</p> <p>'Prior to the commencement of the development, details of 400 integrated bat cavity boxes, and 400 integrated swift boxes, shall be submitted to and approved in writing by the local planning authority. The approved measures shall be incorporated into the scheme, be fully constructed prior to occupation of the approved development and retained as such thereafter.'</p> <p>Reason: To conserve and enhance biodiversity in accordance with NPPF.</p>
<p>Environmental And Community Protection (DBC) - Noise</p>	<p>The assessment of noise in the Environmental Statement Main Report is to a standard and level of detail that we'd expect, it covers most of the concerns I'd have however we would look to impose conditions, specifically conditioning the mitigation and methodology outlined in sections 12.8 - 12.12. This mitigation should be implemented across the entire development and maintained throughout, I believe you guys have a standard condition for this.</p>

We would also like to condition the submission of a CMP as outlined in their report as below:

1. Prior to determination, a Construction Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The approved Statement shall be adhered to throughout the construction period and the approved measures shall be retained for the duration of the demolition and construction works

REASON: Details are required prior to the commencement of development in the interests of safeguarding highway safety and residential amenity of local properties in accordance with Appendix 3 of the Dacorum Borough Local Plan (2004), Policy CS12 of the Dacorum Borough Core Strategy (2013) and the relevant sections of the NPPF (2019).

Informative:

The Statement required to discharge the Demolition and Construction Management Plan condition of this consent is expected to cover the following matters:

- o the parking and turning of vehicles of site operatives and visitors;
- o loading and unloading of plant and materials;
- o storage of plant and materials used in constructing the development;
- o the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- o details of measures to prevent mud and other such material migrating onto the highway from construction vehicles;
- o wheel washing facilities;
- o measures to control the emission of dust and dirt during demolition and construction;
- o a scheme for waste minimisation and recycling/disposing of waste resulting from the demolition and construction works, which must not include burning on site.
- o design of construction access
- o hours of demolition and construction work
- o control of noise and/or vibration
- o measures to control overspill of light from security lighting

We would also look to add the following informative comments:

Waste Management Informative

Under no circumstances should waste produced from construction or

demolition work be incinerated on site. This includes but is not limited to pallet stretch wrap, used bulk bags, building materials, product of demolition and so on. Suitable waste management should be in place to reduce, reuse, recover or recycle waste product on site, or dispose of appropriately. These details should be included in the CMP/DMP referred to in the above condition.

Invasive and Injurious Weeds - Informative

Weeds such as Japanese Knotweed, Giant Hogweed and Ragwort are having a detrimental impact on our environment and may injure livestock. Land owners must not plant or otherwise cause to grow in the wild any plant listed on schedule 9 of the Wildlife and Countryside Act 1981. Developers and land owners should therefore undertake an invasive weeds survey before development commences and take the steps necessary to avoid weed spread. Further advice can be obtained from the Environment Agency website at <https://www.gov.uk/japanese-knotweed-giant-hogweed-and-other-invasive-plants>

APPENDIX B: NEIGHBOUR RESPONSES

Number of Neighbour Comments

Neighbour Consultations	Contributors	Neutral	Objections	Support
286	319	2	296	2

Neighbour Responses

Address	Comments
4 Adams Way Tring Hertfordshire HP23 5DY	<p>On a personal level I'm disappointed that a planning application of this size has been considered for Tring and in this area.</p> <p>We are already impacted in the surrounding environment by the extension of Aylesbury, HS2 and the lack of adherence to the rules by Luton airport. Our natural environment is under such strain. Also because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
3 Thomas Gardens Tring	I object to the planning application (22/01187/MOA) for the following reasons:

<p>Hertfordshire HP23 5FN</p>	<p>The fact that the plan proposes to build on green belt, which is also adjacent to the Area of Outstanding Natural Beauty. This, when there is a review currently being undertaken by Dacorum Borough Council to utilise brownfield sites and minimise encroachment on greenbelt. It does not make sense to agree to proposals, when the outcome of the review is unknown.</p> <p>The scale of the development compared to the current size of Tring is inappropriate. There is already a sizeable development at Roman Park and this proposal, in addition, would increase the population of Tring by 34%. This is a huge increase and cannot but impact the nature and character of Tring.</p> <p>I am not against growth for Tring per se, such growth should be appropriate to its size and thereby endeavour to maintain its charm and existing character. It is an historic market town worth preserving because of its unique nature and the way in which it serves people, in the Hertfordshire community and beyond, wishing to enjoy the pleasures of Ashridge and rural landscapes. It is easy to make decisions that change a place forever, and there is no going back, as can be witnessed by developments that change the nature of local communities, increase density and congestion, and have poorly thought through and disjointed provision of necessary infrastructure.</p> <p>A proposal of this nature with all the 152 associated documents and 5,500 pages to digest merits a longer timeframe to respond. It feels like this approach is designed to make appropriate response difficult. I hope that this application will be opposed and Dacorum Borough Council will be able to finish their review and make a highly considered decision about any development on protected land.</p>
<p>The Croft Northchurch Common Berkhamsted Hertfordshire HP4 1LR</p>	<p>I write to register my concern & objection to the above planning application. The basis for my concern is that, as it is a Hybrid application, the assurances from the developers concerning resources, layout & scale have no material value. In the Green Belt, adjoining an AONB, surely acceptance of proposals must only occur where officers can confidently assure local residents/voters of the precise nature of the development.</p> <p>My further concern is that the infrastructure required to support the proposed development (and others in the Berkhamsted/Tring area) has had insufficient attention. If this proposal of such major scale is accepted before the Dacorum Local Plan review is completed it will indicate that consultation with residents/voters is a meaningless exercise.</p>
<p>The Toll House Bulbourne Road Bulbourne Tring Hertfordshire HP23 4NG</p>	<p>I am writing to record my objection to the plan by Harrow Estates to build 1400 properties on greenfield land in the greenbelt just outside Tring.</p> <p>Greenbelt land should be protected. This land is adjacent to the Chilterns AONB and is within the Chilterns Beechwoods SAC. No exceptional circumstances have been provided for disregarding this protection.</p>

	<p>The scale of the development is out of scale to the small market town of Tring, especially in the context of the large ongoing "Roman Park" development which is already putting additional pressure on the town's infrastructure. The developer's claims about the provision of new infrastructure are empty: the actual provision of new schools etc would be provided by the local authority, not the developers, and no commitment to new infrastructure has been made. Bulbourne Road to the north of the development is single lane at two points and is already dangerous for cyclists. The development is too far from any amenities to access them on foot and will be overwhelmingly dependent on cars, despite the developer's gestures towards sustainability.</p> <p>Given the scale of environmental degradation and the ongoing collapse of ecosystems within the UK, much more thought needs to be given to largescale developments on protected land. The claims by the developers that concreting over fields will improve biodiversity certainly says something about modern agriculture, but it is not a path that is likely to lead to a liveable environment for our children.</p>
<p>Demeath Shootersway Berkhamsted Hertfordshire HP4 3TU</p>	<p>I strongly object to these proposals and request Dacorum Borough Council refuse this application, which would have such an extremely detrimental effect on our Chiltern countryside, its AONB, the Borough and the market town of Tring.</p> <p>DBC is currently reviewing the Local Plan, following community feedback from last year's consultation, with an intention to consider brownfield urban sites within the Borough, rather than release Green Belt. It is imperative that this review should be finalised before any decisions are made on releasing Green Belt, particularly that of such a substantial nature and in such a significant location in the Chilterns and the Borough.</p> <p>The site adjoins and forms part of the setting for the Chilterns Area of Outstanding Natural Beauty</p> <p>Development will be visible from the high points of the AONB, such as Ivinghoe Beacon, thus destroying its rural and peaceful green character</p> <p>Site is currently cultivated as Grade 2 agricultural land - nationally, especially at this time , we need to increase our food self-sufficiency, not concrete over valuable farmland Large number of dwellings will drastically and adversely change the rural setting & character of the market town of Tring</p> <p>Increase in traffic</p> <p>The size of the proposed development is far greater than is appropriate for the present size of the town, which has already been extended recently by a large housing development on its Western edge.</p>
<p>7 Elm Tree Walk Tring Hertfordshire HP23 5EB</p>	<p>I am writing to you today as I strongly object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on land that is designated Green Belt which abuts and is part of the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify releasing this land</p>

	<p>To build on land which is an area protected by the Chiltern Beechwoods Special Area of Conservation - Any increase in footfall and traffic pollution in this AONB should be cause for alarm</p> <p>To develop a huge area of housing which is completely out of proportion and inappropriate to the scale of the historic market town of Tring which already needs to assimilate the effects of the large Roman Park housing development on existing public health services, local amenities and traffic. The size of the roads in Tring were not built for the existing volume of cars and amenities such as car parks for the station and shops are already full.</p> <p>To provide a contribution to schools and community buildings but there is no commitment or guarantee that Dacorum Borough Council, Hertfordshire County Council or the NHS will provide these buildings and no indication of the percentage of the contribution from the developers. The size of the development does not take into account that GP services and local hospitals are already over-stretched</p> <p>To build on land currently cultivated as Grade 2 agricultural land. Changes in global food availability due to instability caused by war and the climate emergency makes this agricultural land valuable for our national food security</p> <p>A timeframe of development over 11 years. There will be adverse effects from the construction process for nearby residents and residents of the town and surrounding villages, for a drawn-out period - construction is adjacent to the station and any changes to narrow Station Road will affect commuters and parking for the station as well as in the town's car parks. Schools, GP and hospital services will not cope with any more demand. The impacts from construction such as noise and light pollution will adversely affect the wildlife and biodiversity in and around this protected area</p> <p>To drastically change the size of the ancient, historic market town of Tring. This will completely alter the town's character and its peaceful, rural setting which residents value so highly.</p> <p>I would also like to add that given the volume of the planning application documents the public should be given longer to be able to study and respond than the May 4th deadline.</p>
<p>Watermans Cottage Lock 44 Bulbourne HP23 4NG.</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the

	<p>Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>48 Mill View Road Tring Hertfordshire HP23 4EP</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>2 Grove Gardens Tring Hertfordshire HP23 5PX</p>	<p>I object to this so called 'Marshcroft Garden Village'for the following reasons:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. Covid 19 over the last two years has proven that open space is a necessity for good mental health and social welfare. 4. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 5. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 6. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>12 Nursery Gardens Tring Hertfordshire HP23 5HZ</p>	<p>I have resided in Tring since 2001, and I object to this ridiculously oversized development application on the following grounds:</p> <ol style="list-style-type: none"> 1) the size of the development is out of all proportion to the size of the existing Town. It would totally overwhelm all public services - roads, schools, doctors, dentists, shops - and there is no guarantee as to if or when additional facilities would be built. Even if such additional

	<p>facilities were built, such a large development would totally change the nature of this market town forever.</p> <p>2) green belt land within an AONB should only ever be used for additional housing as a very last resort - there are still brownfield sites around Tring that should be used first for additional housing.</p> <p>3) being in very close proximity to the Grand Union Canal, it would severely degrade the peaceful rural nature of the canal between Wendover and Marsworth. The canal is invaluable as a tourist attraction and also as a nature corridor, and I believe that any developments within a kilometre of the canal should be required to provide a full impact assessment to clarify their potential impacts.</p>
<p>7 Ridgeway Gardens Tring Hertfordshire HP23 5FT</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p>
<p>10 Grove Park Tring Hertfordshire HP23 5JL</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this</p>

	<p>review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>73 Dundale Road Tring Hertfordshire HP23 5BY</p>	<p>I strongly oppose the proposed development of the building of 1400 houses in the fields adjoining Marshcroft Lane. Tring has already grown by 34% with the building of homes on Icknield Way. To develop the town even further would be devastating. The infrastructure could not cope, even with the building of new schools. This proposed development would change the character of this historic market town. I believe that building on green belt land in an area of Outstanding Natural Beauty is wrong.</p>
<p>38 Beaconsfield Road Tring Hertfordshire HP23 4DW</p>	<p>I am writing to raise my objection against the above mentioned Planning Application on the following grounds (I was unable to login to the website to raise the objection there):</p> <p>The proposed site is currently green belt land and adjacent to an Area of Outstanding Natural Beauty, with no exceptional justification as to why this should be required. Dacorum is currently reviewing all their brownfield sites in urban areas, which should be completed before any further Green belt land is built on.</p> <p>The plan is out of proportion with the current population of Tring - and would comprise a 34% increase in the population of this small town. Additional infrastructure would be required to support this population (Schools, healthcare etc.), but there is no provision or support for this from the Dacorum Borough Council or Hertfordshire County Council - Tring School has recently been refurbished, so I can't see additional funding being supplied to build another school.</p> <p>There is already additional 200+ houses being built on the other side of Tring (Roman Park) which is already built on green belt land.</p> <p>The proposed land has the protection of the Chilterns Beechwoods</p>

	<p>SAC (Special Area of Conservation, which provides protection of Green Belt land near Ashridge Estate and Tring Woodlands. Tring Station does not have sufficient service to support the additional load this population would inevitably bring.</p>
<p>15 Eggleton Drive Tring Hertfordshire HP23 5AJ</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p>
<p>The Frog And Nightgown 22 Marshcroft Lane Tring Hertfordshire HP23 5PP</p>	<p>I wish to object to the above planning application for the following reasons</p> <p>This is Green belt Land in a special area of conservation adjacent to an area of Outstanding Natural Beauty and the review on the need to build on Green belt should be completed !!</p> <p>The scale of this development is inappropriate to the size of the Historic Market Town of Tring and will br-break the local infrastructure !</p> <p>There are more suitable locations to the east of the town where people can walk into town without the need to sacrifice our beautiful Green Belt land.</p> <p>I accept that Housing growth has to develop in Tring in the future but</p>

	<p>should be on a smaller scale and closer to the High Street and the A41</p>
<p>25 Station Road Berkhamsted Hertfordshire HP4 2EY</p>	<p>I am writing to strongly object to the planning application 22/01187/MOA to build 1400 homes near Marshcroft Lane. My reasons are as follows:-</p> <p>The proposed development would be on green belt land which is also adjacent to an Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land, whilst Dacorum Borough Council is currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on green belt land.</p> <p>The application proposes to build on land which has the protection to the Chilterns Beechwoods SAC.</p> <p>The scale of the proposed development is totally inappropriate to the current size of Tring. This development combined with Roman Park would increase the population of Tring by 34%. This would have a strongly negative impact to the character of this historic market town and completely overwhelm the local infrastructure. The roads around the proposed development as well as the A41 are already over-used and the A41 is a disaster following even the most minor of incident during commuter hours, and the proposed development would only make this situation worse.</p> <p>There is no concrete commitment to new schools or health facilities contained within the proposal nor any current commitment from Dacorum Borough Council or the NHS to provide such facilities. I note that it already takes up to 10 days just to get a telephone appointment with my GP.</p> <p>The proposed development makes little effort to address the potential negative impacts to the environment and does not provide for green transport or effective alternatives to driving even for the smallest journey.</p>
<p>2 Grove Farmhouse Marshcroft Lane Tring Herts</p>	<p>I am writing to put forward my objections to the speculative planning application to build 1,400 houses, East of Tring (22/01197/MOA).</p> <p>I admit I am little frustrated that even following a council plan for the same space being vetoed, developers are still able to apply for permission, before a council new plan has been put in place. I am aware that the rules allow for this but surely it is more logical and much fairer on local residents to impose a 3-5 year wait on new applications as the reasons for the plan being rejected are still relevant.</p> <p>In terms of my objections, I echo many voices in stating the following...</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.

	<p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>Rowans 85 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the</p>

	<p>scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>Tring Rugby Club Cow Lane Tring Hertfordshire HP23 5NS</p>	<p>Tring Sports Forum wishes to register its objection in the strongest possible way to the above Planning Application.</p> <p>Although TSF's main methodology over the past 18 years since its formation has been to restrict its comments mainly to matters concerning sporting and leisure activities, in this case it is felt that the tactics of the applicant warrant comment concerning the scale, location and component-mix of the proposed development. The raison d'etre of TSF has always been and still is to ensure that the sporting and leisure facilities in Tring are increased to match the increase of the population; the increase in the amount of extra sporting facilities, both outdoor and indoor required to accommodate any amount of extra housing is considerable. The Green Belt, over-development, ecological and other objections have been well-made by others - TSF concurs with them all.</p> <p>Firstly the scale of development. 1400 extra houses on the outskirts of Tring is totally out of proportion to the existing size of the Town. TSF has always worked very closely with TTC councillors, some of whom also serve on DBC, and concur with their comments. The amount of sports land required to meet the needs of the existing population of Tring is grossly short at present, let alone for the massive new development proposed. This has been identified by various expensive reports and surveys commissioned by DBC and others over the years; the applicant has paid no heed to these whatsoever - the proposals are completely inadequate.</p> <p>Secondly, the location. TSF has made its case at every possible juncture over many years that this is not the best location for any new hybrid development and contends that a much smaller Dunsley Farm proposal would be far superior for many reasons and more popular generally with Tring residents and organisations. This has been identified repeatedly in various Local Plan revisions etc. Many meetings have been held with Herts CC over the years to discuss the possible development of their land, culminating in a planned HCC/DBC/TSF meeting that was cancelled with the onset of Covid 19. TSF waits to be consulted on their proposals by DBC officers and feels that the applicant is pressurising the often-under-staffed officers at DBC to force its proposals through - bullying tactics, it is felt.</p> <p>Thirdly, the component-mix. Although it is appreciated that this is only an Outline Application, it is felt that the applicant's scant regard for sport & leisure facilities is appalling. TSF is concerned that should the application be successful, the red-line has been craftily drawn to allow for an 'in-fill' site of a further 4 - 500 houses at the New Mill end of the site in the future - more over-development.</p> <p>But by far away TSF's biggest objection is to the prematurity of the application - in fact the timing is regarded as cynical. The Govt. are due to make their announcement on planning 'levelling-up' on May 12th, almost certainly the pressure for local-authorities to build 100's of '000's of houses in the SE will be reduced. The school requirement will also reduce, as will the amount of land required for sport, no</p>

	<p>doubt. Existing sports clubs' expansion by way of Community-Use-Agreements etc. is the answer to help create a balanced Local Plan for Tring - this can be achieved by the community negotiating once housing numbers are known. DBC must be very wary of the applicant's tactics - it will probably appeal either a refusal or non-determination, TSF hope and trust that DBC are aware of this and will take action accordingly.</p> <p>The applicant has never approached TSF for its views, despite the fact that it represents some 25+ sporting organisations in Tring. It claims that it has revised its plans after consulting with local organisations!</p> <p>TSF look forward to ongoing discussions with DBC, TTC, and HCC officers and councillors on the revised Local Plan as soon as new housing requirements are known. Please contact the writer.</p>
<p>72B Western Road Tring Hertfordshire HP23 4BB</p>	<p>I write to request that the Planning Committee refuse permission for this proposal on the following ground:</p> <ol style="list-style-type: none"> 1. The site is located in designated Green Belt Land and as such can only be developed in exceptional and very special circumstances. 2. Notwithstanding the above, the Developer has attempted to slip this application in before DBC has completed it's review of the Local Plan. The Planning Committee must refuse to make a decision until the Local Plan has been updated. 3. The development is proposed on existing productive farmland. We should be reducing our dependency on imported food to reduce food miles and improve the environmental sustainability of food production. 4. The site has in the recent past suffered from flooding and on at least one occasion the Station Road to Marshcroft Lane section was partially under water for several months. 5. Existing local infrastructure would not cope. Not only does the site flood but the roads cannot take the increase in traffic. Also, being an old town, the foul drainage systems would be severely impacted. 6. The site falls within the zone of influence of the Chilterns Beechwoods Special Area of Conservation. With the site being in such close proximity to Ashridge there would inevitably be an increase visitor numbers to this site. Ashridge already suffers with excessive visitor numbers. 7. There is already inadequate Doctor's Surgery provision in the area. With the number of houses the increase in population of the town could be between 3500 to 5600 people. 8. The amenities in the Town would be swamped. 9. There has already been a large Development on the Icknield Way site which is nearing completion. The Planning Department must consider the cumulative effects of developments and not individual applications in isolation. <p>Please do the right thing and flatly refuse this wholly inappropriate Planning Application.</p>
<p>Bryntirion 106 Grove Road</p>	<p>As a Tring resident born and bred I object to this development ,as it's an erosion of our countryside with out any contribution to the present</p>

<p>Tring Hertfordshire HP23 5PA</p>	<p>community, the town is already struggling to cope with the addition of the development at Aylesbury end of the town, and adding more homes is a joke at the expense of the existing residents, for that reason I see no justification for this being granted and putting more traffic in the area already used as a cut through for all the villages.</p>
<p>52 Carrington Place Tring Hertfordshire HP23 5LA</p>	<p>I wish to register my strongest objections to the planning application 22/01187/MOA. This is Green Belt/AONB land and deserves protection for that very reason. With the declaration of a climate and ecological emergency by DBC I find it hard to stomach that these plans even have to be considered? This proposed development is too large, and our infrastructure will not cope with it. The character of our historic market town will be forever lost.</p>
<p>3 Church View Long Marston Tring Hertfordshire HP23 4QB</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. 6. I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>

<p>5 West Passage Tring Hertfordshire HP23 6AY</p>	<p>I am writing to object in the strongest possible terms to the proposed Marshcroft Garden Village development on the following grounds:</p> <p>1. Size and scale of the development. Tring is a small market town of approximately 12,000 people, with according amenities and infrastructure. Assuming an average occupancy of three persons per new home, the addition of 1400 houses in this development would effectively increase the population (and geographical area) of the town by a third in one go. Tring does not have the capacity to accommodate such a large and sudden increase. Developer considerations of this are at best speculative (e.g. that they could build schools and doctor surgeries) but on the whole inadequate (e.g. the lack of understanding of the pressure that such an increase would place on already heavily congested narrow roads, such as Station Road and the High Street). There is already a large development being constructed to the west of the town (Roman Park) and no thought is being given to the cumulative effects of so many large developments.</p> <p>2. Environmental impact and loss of protected land. The proposed development would be constructed on protected Greenbelt land that is in near-immediate proximity to a designated Area of Outstanding Natural Beauty and a Special Area of Conservation. It is not clear why the development needs to be here and why a redevelopment of a Brownfield site elsewhere in the Borough cannot be considered instead.</p> <p>Based on the turnout and nature of the discussions at Tring Town Council's most recent meeting, local objections to this development appear to be widespread and significant. Any representations made by the developer that they have 'consulted the community' are cynical and disingenuous. The online survey only gave the option to comment on the aesthetics of the development, and was designed to deliberately prevent any form of objection or meaningful discussion. Their own in-person consultation was billed as 'not the place to voice objections', and their publication of 1500 pages related to their proposal seems to be a deliberate attempt to obfuscate and deter most ordinary people from scrutinising and engaging with their plans.</p> <p>Speaking as an individual, I agree that there is a need for new housing to be built in the Borough. However, we should be examining opportunities for in-fill and redevelopment. We should not be considering building vast new developments on protected land, and certainly not in such an unsustainable manner.</p>
<p>East View 25 Grove Road Tring Hertfordshire HP23 5HA</p>	<p>I object to the planning application (22/01187/MOA) because it proposes: To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this</p>

	<p>review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>2 Fog Cottages Tring Station Tring Hertfordshire HP23 5QP</p>	<p>I strongly object to this planning application for many reasons:</p> <p>It is green belt land. Green belt land was created to protect the environment and communities from unwanted and unnecessary development. This green belt land is adjacent to an AONB and should definitely not be built on.</p> <p>They want to build on land which has protection of Chiltern Beechwoods.</p> <p>The land in question is grade 2 agricultural land which is needed and likely to be needed more in the future.</p> <p>The build along with the recent development of Roman Park will lead to a 34% increase in population which will break our already stretched infrastructure and change the character of our historic market town forever.</p> <p>There is a lot of wildlife living in and on these fields.</p> <p>Once built on, our green land will be gone and irreplaceable.</p> <p>The roads simply cannot take the traffic that will be generated.</p> <p>Tring has changed so much already in the last 50 years.... But this would change it beyond recognition. The damage to our rural communities would be irreversible.</p>
<p>17 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>I strongly object to Planning Application 22/01187/MOA for the following reasons:</p> <p>The application is hybrid which means that permission is sought for some of the site with full details of the remainder to follow under</p>

reserved matters, so there is no guarantee that any final development would be anything like that illustrated in the developer's promotional material. In particular, I am very concerned that the Suitable Alternative Natural Green Space (which is actually totally unsuitable) would be delivered as this, and other green spaces, will restrict the number of houses which might eventually be built for the developer's profit.

The site is currently a beautiful natural space, providing open views towards the Chilterns AONB and the Grand Union Canal, which are easily accessible to the many people who already enjoy its peace, mature green landscape and wildlife, by walking, cycling, running, horse-riding, boating, fishing.. It cannot be replaced by an artificial man made 'green area' which will take years to mature if ever built.

Local Planning Authorities have complete discretion on whether or not to accept a hybrid application. I urge DBC not to accept this.

The whole site is in designated Green Belt, which can only be released for development in exceptional & very special circumstances, (National Planning Policy Framework 20.7.21 notably paragraphs 147-9). It is quite clear that these proposals fail to fulfil that statutory obligation.

DBC is currently reviewing the Local Plan, following community feedback from last year's consultation, with the intention to consider brownfield and urban sites within the Borough, rather than release Green Belt.

It is imperative that this review should be finalised before any decisions are made on releasing Green Belt, particularly that of such a substantial nature and in such a significant location in the Chilterns and the Borough.

Therefore this application is unwarranted and premature.

The site adjoins and informs the setting for the Chilterns Area of Outstanding Natural Beauty and will therefore have extremely high adverse impact upon that landscape, which is protected under statute by the Countryside & Rights of Way Act 2000 s85 (CROW Act).

Development will be visible from the high points of the AONB, such as Ivinghoe Beacon, thus destroying its rural and peaceful green character.

As a Local Authority, DBC has an obligation under the CROW Act to 'protect and enhance' the AONB. If this development goes ahead, it is my considered opinion, that DBC will have failed to fulfil this obligation.

The site is Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not concrete over valuable farmland. Crops of barley and linseed oil have already been sown ready for harvesting this year. This permanent contribution to our nation's food would be lost.

The large number of buildings - 1,400 houses plus 2 schools, community hub and associated roads - will drastically and adversely

change the rural setting & character of the market town of Tring forever.

Inevitably there will be a vast increase in traffic to/from any development onto single carriage roads, one with a narrow bridge where access is controlled by traffic lights. I do not accept the developer's premise that cycle ways and foot paths will tempt residents to completely abandon their cars to reach either the station or the town centre. It would certainly be too far to walk back from town centre shops with heavy shopping bags.

The size of the proposed development is far greater than is appropriate for the present size of the town, which has already been extended recently by a large housing development on its Western edge.

I accept there is need for housing within the Borough and affirm DBC's decision, in line with central Government policy, to optimise development of brownfield & urban sites, before any consideration of releasing Green Belt,

The developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution'.

The proposals ignore extra demand on hospital health care, already under pressure. Building a health centre, which will only serve new housing, does not alleviate demand on local hospitals.

There is no guarantee that authorities responsible for healthcare and educational provision within the Borough will be willing to facilitate or financially contribute towards the schools, health centre and other community resources proposed. Herts CC is in the final stages of extensive renovation of Tring School and, I would suggest, is highly unlikely to make further funds available. Any new schemes for educational provision would not have been costed in under current & forecasted budgets.

The developer (Harrow Estates/Redrow) only owns part of the site (that nearest to Station Road) so no commitment that the whole site would be developed as is outlined in this application.

The timeframe of development over 11 years (2022-33) means long drawn out adverse impacts of construction, loss of amenity, increased demand on local resources without obligation for developer to provide infrastructure, and other associated adverse effects, especially for presently neighbouring residents and parking in town centre and at Tring Station

This site falls within the Chilterns Beechwoods Special Area of Conservation (SAC) - March 2022. We understand that DBC is required to implement mitigation to alleviate visitor pressure on Ashridge and Tring Woodlands. This site falls within the Zone of Influence and should be protected from development of any kind.

At the recent Tring Town Council meeting which was well attended by

	<p>the public who were unanimously against these proposals, the Council unanimously agreed to recommend refusal of the application. I strongly endorse these statements.</p> <p>These proposals would have an extremely adverse effect on our Chiltern countryside, our precious Green Belt land & AONB, the Borough and the ancient market town of Tring. I urge DBC to refuse the application.</p>
<p>5 Station Road Tring Hertfordshire HP23 5NG</p>	<p>Please see points below for inclusion in conditions of any granted planning permission.</p> <p>Are there plans to set up an apprenticeship scheme with the developers - some developments include this as a condition to employ local people.</p> <p>Will a community chest be created for local community groups to access as a result of CIL and S106?</p> <p>CIL and S106 gain to be guaranteed to be spent in Tring</p> <p>20mph zone for along Station Road - from station and town centre</p> <p>Secure cycle parking in town centre with CCVT coverage</p> <p>Create a Tring Town Centre Realm improvement plan</p> <p>Improvements to town centre entrances off A41</p> <p>How much as has the town council been involved?</p>
<p>Cherrycroft, Trooper Road, Trooper Road Tring hp235rw</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1) To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2) To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3) To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4) Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5) To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>1 Grove Farm House Marshcroft Lane Tring Hertfordshire HP23 5PW</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>12 Posting House Tring Station Tring Hertfordshire HP23 5QS</p>	<p>I object to the planning application because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this

	<p>review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>11 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>Dear Sir/Madam</p> <p>I would like to strongly object to this application that would lead to significant over-development of Tring.</p> <p>Not only would the development be on green belt land and significantly impact an AONB but the market town of Tring and its infrastructure just cannot cope with such a significant increase in houses.</p> <p>Services are already over-stretched and traffic barely moves through the centre of town most days due to the existing number of residents (including the new development at the other end of town which is still not 100% occupied).</p> <p>The ability to enjoy the countryside if its built over in such a significant way will be lost forever for future generations.</p> <p>Finally, the inclusion in the plans of provisions for new schools and a Dr's surgery are cynical at best as the developers would know full well there are no guarantees of local authority funding for them.</p> <p>I sincerely hope this suggestion is rejected as simply unsuitable for a town the size of Tring</p>
<p>40 Windmill Way Tring</p>	<p>I strongly object to the planning application 22/01187/MOA.</p>

<p>Hertfordshire HP23 4HH</p>	<p>There are many good reasons to refuse this application, including the following points:</p> <p>1) Unplanned development. This proposal is for an extremely large development which would make Tring approximately a third bigger than it currently is. Such development should *only* take place with the consent and approval of the town, in the context of a detailed vision for the future of the area. The National Policy Planning Framework (NPPF) sets this out: paragraph 15 states that "The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area". This application is a developer-led attempt to pre-empt the Dacorum Local Plan, which has not yet been finalised and is in flux. This alone should lead DBC to refuse it. Developers are not in charge: local residents through their elected representatives are.</p> <p>2) Destruction of Green Belt. This application requires the release green field land within the Green Belt. This is contrary to the stated aim of national planning policy, as per NFFP paragraph 137: "The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." NPPF paragraph 149 states "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt". It gives a list of exceptions to this principle, but importantly none of them apply to the proposed development. NPPF paragraph 140 makes it clear that changes to Green Belt boundaries should only happen "where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans". Paragraph 141 continues: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development." With regard to the Green Belt, the planning application should be refused on these grounds: there has not been a justification of exceptional circumstances; it is not part of an up-to-date strategic plan; and there is no evidence that all other options have been exhausted.</p> <p>3) Ineffective use of land. The green fields upon which the application proposes to build are Grade II (very good) Agricultural Land. These fields were analysed in the DBC Interim Sustainability Appraisal (SA) of November 2020, and found to be amongst the "best and most versatile" agricultural land in the Borough and that development here would have "significant adverse effects" (SA 6.4.7). Table 5-6 of the SA shows that this site ("East of Tring") receives the lowest possible score ("The option is likely to have a significant negative effect") when assessed against the Sustainability objective "Make efficient use of land and soil". We live at a time when weak global supply chains, a cost of living</p>
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crisis, and the climate crisis all make it important to produce food locally. High quality agricultural land is already serving an important use, and the need for new homes must be balanced against the need to feed our population.

NPPF paragraph 119, makes it clear that there is a duty to strike this balance of needs:
 "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."

NPPF paragraph 120(b) explicitly names food production as a function to be taken into consideration during planning:
 "Planning policies and decisions should:
 (b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;"

Agricultural fields are not just "empty space". It is clear that the proposed development would have a serious negative impact on local food production. As such the application should be further rejected on the grounds of ineffective use of land and soil.

4) Unsustainability due to overdevelopment
 The proposed development is far too big to be sustainable. It is utterly inappropriate to the current size of Tring, and would increase the town's population by >30%, whilst bringing thousands more cars to our roads.

The midpoint of the new suburb (1 mile from the centre) would be at the limit of "walkability" threshold for fit adults. The reality of the situation is that it would mean more traffic on roads that are already congested. Attempts to mitigate these problems with additional bus services might well make the situation worse: large vehicles already block the High Street on a regular basis.

Other infrastructure such as town parking, train station parking, supermarkets, surgery places, school places, and allotments are already stretched. This proposal purports to include new local infrastructure and amenities, but these are completely empty promises: outside of the context of a Local Plan, they are not something that the developer can actually deliver - and the developer knows this. As such it should be refused on the grounds of overdevelopment that would be unsustainable.

5) Negative impact on Chilterns AONB, Chilterns Beechwoods SAC & Pendley Manor
 The planning application relates to green field sites directly adjacent to the Chilterns AONB. These fields form part of the buffer around the AONB, enhance its beauty and provide a gateway to and from it. A development of this size would invariably have a tremendous impact that would change the setting of the AONB forever. As the local planning authority, DBC has a duty to prevent such impacts under the Countryside and Rights of Way Act 2000 s85(1):
 "In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

	<p>Furthermore, the proposed development falls within the 12.6km Ashridge Commons and Woods Zone of Influence, which is there to protect the Chilterns Beechwood SAC from visitor damage. It would be irresponsible to allow a large development within this area, with the inevitable result of increased visitor numbers to the SAC. Lastly, the proposed development would negatively impact the rural setting of Pendley Manor. The application should be refused on all these grounds.</p> <p>6) Negative impact on local character Tring is a small market town with a strong character: high levels of walkability, William Huckvale's distinctive "Old English" architecture, a closeness to the countryside, community activities such as parades and markets. The proposed large development would erode all of these facets of Tring's character. It would create greater car dependence in the town, and water down the concentration of distinctive architecture; it would push the countryside further away from those of us who already live here, and erode the sense of community that thrives in small towns. Tring deserves careful stewardship. This planning application fails in that regard, and for that reason, and all the others listed above, it should be rejected.</p>
<p>1 The Barns West Leith Tring Hertfordshire HP23 6JJ</p>	<p>To whom it may concern I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>1 Pheasant Close Tring Hertfordshire HP23 5EQ</p>	<p>This plan will massively increase the number of houses and number of residents of Tring, fundamentally changing the character of this historic market town. It doesn't take into account the needs or feelings of existing residents and of the existing town. It is far too big for Tring and is out of balance with locals' needs for new houses. Local people value their green space! It should also be considered in tandem with the other planned developments, which together will increase Tring by >50% which is not sustainable and not serving the town well.</p> <p>The land is currently Green Belt, and the legislation says it can only be reclassified if there are "very special circumstances". I don't believe this definiton has been reached. Tring does not need 1400+ new houses. Maybe Dacorum does, but not Tring.</p> <p>I am concerned about the density of housing on this land. 1400 homes is probably in the region of 4000 more bedrooms, equating to 4000 more people. I do not think that that many people can be adequately housed on the land, with space for all of the rewilding, green spaces, and flood mitigation that the plan promises. However, it is hard to tell because the plan does not contain details of the housing developments, the area, etc.</p> <p>Although the fields themselves are not within the AONB, they are completely surrounded by AONB land, and development will have an adverse impact on the views and the character of the Area.</p> <p>This land is part of the waterways system and is an important flood plain. Building on the land will increase the risk of flooding for both the development and the surrounding areas. Even with flood-mitigation plans in place, 1400 homes plus parking spaces and infrastructure will replace absorbant land with artificial surfaces for rain run-off.</p> <p>The roads north and south of the development are both small with congestion issues. They are single carriageways away from the main arterial routes of the A41. They cannot cope with 1400+ new cars, even if not everyone is driving at the same time. There will still be many more cars in the local area than there are now. The developers told me at the public meeting that a transport analysis had been done, but I cannot find it on their web page or the dacroum page.</p> <p>Similarly, can our local freshwater and sewerage system cope? That's a lot of people drawing more water, and emitting more waste into the system. I am yet to be convinced that this is feasible and sustainable.</p> <p>Dear planners</p> <p>I'm writing about the 'Tring Garden Suburb' or 'Land East of Tring', or whatever the development is being called.</p> <p>We wish to object very strongly to the plans, which we believe are bad for the environment and bad for Tring.</p> <p>The sheer amount of space involved - infilling all the fields between station road and bulbourne road up to the canal, is just madness. These are open spaces of greenbelt land, and I do not understand why they would be considered for total destruction in this way.</p> <p>The development would completely change the size and character of Tring. IT's a little market town. This much developed space will at a</p>

	<p>stroke massively increase the size of the town, and start a sprawl towards aldbury and Bulbourne, which is surely what the green belt was specifically intended to prevent. I am suspicious of many of the developers' claims. For instance, about increasing biodiversity. How can building a small town increase anything but human occupation?! When I attended the public consultation, I was told that the land is all currently owned by the developer (Redrow, or Harrow Estate?) so any measurements of the amount of biodiversity or the quality of the land beforehand must be taken with a grain of salt. And surely the land owners are also in part responsible for how productive the land is now. I can't see any incentive for them to make the land attractive for wildlife or to grow good crops if really they want to develop it. Furthermore, I'm underwhelmed by the plans to improve the infrastructure around the new site. I don't think the site, the sewers, the water supply, or the road, can cope with 1400 new homes / 3000+ new people and cars. That's an incredible increase in what is a fairly isolated country setting.</p> <p>And finally, what is really upsetting, is that this might not be the only development permitted in Tring this year. I'm aware of several other parcels of land that are under consideration for new housing. So whatever happens, please do not give permission for all the developments. That could be disastrous for the quality of life of Tring residents, our enjoyment of the countryside and nature, and for our ability to move around our town and enjoy its amenities!</p> <p>THank you for your time</p>
<p>8 Hawkwell Drive Tring Hertfordshire HP23 5NN</p>	<p>Dear Sirs</p> <p>We wish to register our very strong objection to the planning application to build 1,400 homes in Tring (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. This entire proposed development is on Greenbelt land. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. Furthermore the situation has changed since Covid and now there are lots of office spaces which can and are being converted/ rebuilt into residential homes or flats - this has not yet been taken into consideration when assessing housing need and again highlights the importance of allowing the Dacorum Borough Council review of Brownfield sites to happen. 2. To build on Greenbelt land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). I understand that there is currently a moratorium on residential planning applications in this area due to damage from an increasing local population on Beechwoods trees in the Ashridge Estate and Tring Woodland. This proposal is planning to develop on Greenbelt Land which has this special protection. Furthermore this proposal plans to drastically increased the local population. This is totally contrary to what this new special protection aims to achieve which has only just been put in place in March 2022. We are at a point in history where it's absolutely

essential that habitat destruction and loss of biodiversity cannot be allowed to continue. We must act now to protect these areas for now and future generations not concrete over the same.

3. This large scale development will be highly visible from high points of the area of outstanding natural beauty such as Ivinghoe Beacon and the Ridgeway. This will drastically ruin the rural and peaceful character and appearance of the area forever.

4. The proposed development is on Greenbelt land that is currently cultivated as Grade 2 agricultural land. Nationally we need to increase our food self sufficiency (importing food is detrimental to our fight against climate change). As a consequence we should not be concreting over farmland.

5. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Further exacerbated by the fact that there is no guarantee of local infrastructure in this plan (see below).

6. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. This application is a Hybrid Application which we interpret as seeking outline planning permission for the development of the site as a whole with specific details on house design, location of school, service roads etc is to be sought later. It is very concerning that there is no guarantee of two additional schools in this application. As a parent applying for school places for my young children I know first hand that the local schools are already over subscribed and there simply is not the local infrastructure to support all these additional people and families. We understand that Dacorum has complete discretion regarding whether to allow such a Hybrid application - we urge you to exercise your discretion and reject this application.

7. The developer does not state what proportion of costs they will contribute to the essential (but not guaranteed) infrastructure. They just state that they will pay a contribution. We know first hand that there was a successful application to build homes in Pitstone which was supposed to have a nursery and pub built as outlined in the planning application. We understand that these sites are now being sold off to build more residential properties on. This is clearly a very real danger with this Hybrid application and this is unacceptable and inappropriate.

8. This is a large scale development which is given a timescale of 11 years (2022-2033). This means drawn out adverse impacts of construction, loss of amenity, noise, construction traffic on the local people. This is again unacceptable and will ruin the character and appearance of a peaceful, leafy green area.

On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .

We urge Dacorum Borough Council to reject this speculative Hybrid application which will have an extremely detrimental impact on our beautiful Chiltern Countryside, it's AONB, special area of conservation and the historic market town of Tring.

Dear Sirs

We wish to register our very strong objection to the planning application to build 1,400 homes in Tring (22/01187/MOA) because it proposes:

1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. This entire proposed development is on Greenbelt land. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. Furthermore the situation has changed since Covid and now there are lots of office spaces which can and are being converted/ rebuilt into residential homes or flats - this has not yet been taken into consideration when assessing housing need and again highlights the importance of allowing the Dacorum Borough Council review of Brownfield sites to happen.

2. To build on Greenbelt land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). I understand that there is currently a moratorium on residential planning applications in this area due to damage caused by an increasing local population on Beechwoods trees in the Ashridge Estate and Tring Woodland. This proposal is planning to develop on Greenbelt Land which has this special protection. Furthermore this proposal plans to drastically increased the local population. This is totally contrary to what this new special protection aims to achieve which has only just been put in place in March 2022. We are at a point in history where it's absolutely essential that habitat destruction and loss of biodiversity cannot be allowed to continue. We must act now to protect these areas for now and future generations not concrete over the same.

3. This large scale development will be highly visible from high points of the area of outstanding natural beauty such as Ivinghoe Beacon and the Ridgeway. This will drastically ruin the rural and peaceful character and appearance of the area forever.

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6. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. This application is

a Hybrid Application which we interpret as the developer seeking outline planning permission for the development of the site as a whole with specific details on house design, location of school, service roads etc is to be sought later. It is very concerning that there is no guarantee of two additional schools in this application. As a parent applying for school places for my young children I know first hand that the local schools are already over subscribed and there simply is not the local infrastructure to support all these additional people and families. We understand that Dacorum has complete discretion regarding whether to allow such a Hybrid application - we urge you to exercise your discretion and reject this application.

7. The developer does not state what proportion of costs they will contribute to the essential (but not guaranteed) infrastructure. They just state that they will pay a contribution. We know first hand that there was a successful application to build homes in Pitstone which was supposed to have a nursery and pub built as outlined in the planning application. We understand that these sites are now being sold off to build more residential properties on instead of the pub and nursery. This is clearly a very real danger with this Hybrid application and this is unacceptable and inappropriate.

8. This is a large scale development which is given a timescale of 11 years (2022-2033). This means drawn out adverse impacts of construction, loss of amenity, noise, construction traffic on the local people. This is again unacceptable and will ruin the character and appearance of a peaceful, leafy green area. This quite clearly is ridiculous overdevelopment of a quiet, rural, beautiful area.

On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .

We urge Dacorum Borough Council to reject this speculative Hybrid application which will have an extremely detrimental impact on our beautiful Chiltern Countryside, it's AONB, special beechwood's conversation area and the historic market town of Tring.

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yet been taken into consideration when assessing housing need and again highlights the importance of allowing the Dacorum Borough Council review of Brownfield sites to happen.

2. To build on Greenbelt land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). I understand that there is currently a moratorium on residential planning applications in this area due to damage from an increasing local population on Beechwoods trees in the Ashridge Estate and Tring Woodland. This proposal is planning to develop on Greenbelt Land which has this special protection. Furthermore this proposal plans to drastically increased the local population. This is totally contrary to what this new special protection aims to achieve which has only just been put in place in March 2022. We are at a point in history where it's absolutely essential that habitat destruction and loss of biodiversity cannot be allowed to continue. We must act now to protect these areas for now and future generations not concrete over the same.

3. This large scale development will be highly visible from high points of the area of outstanding natural beauty such as Ivinghoe Beacon and the Ridgeway. This will drastically ruin the rural and peaceful character and appearance of the area forever.

4. The proposed development is on Greenbelt land that is currently cultivated as Grade 2 agricultural land. Nationally we need to increase our food self sufficiency (importing food is detrimental to our fight against climate change). As a consequence we should not be concreting over farmland.

5. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Further exacerbated by the fact that there is no guarantee of local infrastructure in this plan (see below).

6. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. This application is a Hybrid Application which we interpret as seeking outline planning permission for the development of the site as a whole with specific details on house design, location of school, service roads etc is to be sought later. It is very concerning that there is no guarantee of two additional schools in this application. As a parent applying for school places for my young children I know first hand that the local schools are already over subscribed and there simply is not the local infrastructure to support all these additional people and families. We understand that Dacorum has complete discretion regarding whether to allow such a Hybrid application - we urge you to exercise your discretion and reject this application.

7. The developer does not state what proportion of costs they will contribute to the essential (but not guaranteed) infrastructure. They just state that they will pay a contribution. We know first hand that

	<p>there was a successful application to build homes in Pitstone which was supposed to have a nursery and pub built as outlined in the planning application. We understand that these sites are now being sold off to build more residential properties on. This is clearly a very real danger with this Hybrid application and this is unacceptable and inappropriate.</p> <p>8. This is a large scale development which is given a timescale of 11 years (2022-2033). This means drawn out adverse impacts of construction, loss of amenity, noise, construction traffic on the local people. This is again unacceptable and will ruin the character and appearance of a peaceful, leafy green area. This is ridiculous overdevelopment of a beautiful, quiet, leafy green area.</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p> <p>We urge Dacorum Borough Council to reject this speculative Hybrid application which will have an extremely detrimental impact on our beautiful Chiltern Countryside, it's AONB, special beechwood's conservation area and the historic market town of Tring.</p>
<p>Clayesmore Cottage 61 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. It will also destroy the natural habitat of hundreds of species. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 4. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the

	<p>impact on the environment.</p> <p>6. The development will change the character of Tring and put a huge strain on already oversubscribed resources such as local schools, GPs, and parking.</p> <p>7. The development will also increase the level of Traffic along Grove Road, posing a safety risk to the primary school.</p> <p>8. Water and sewage supply and services are already under strain in this area and this huge increased demand is likely to exacerbate both to the detriment of current residents. Thames water are more and more frequently called out to attend sewage problems and water pressure issues already.</p> <p>9. Broadband/electricity supplies - no mention of how they will address this in an ecological way and to not add further strain to local services.</p> <p>10. There is no commitment from HCC or any transport body to provide public transport of any kind for the residents of this proposed development. Tring Station car park is very expensive and was already unable to fulfil pre-lockdown demand. Usage is building steadily again but it would be most likely that people would be dropped off rather than park at the station increasing the already hazardous road and pedestrian conditions at morning and evening peaks.</p> <p>11. Station Road is already a very busy road with current levels of usage. Adding 1,400 additional household vehicles and new road access to the development would be completely inappropriate for a 2 lane road in this location causing severe additional safety hazards and congestion.</p> <p>12. A longer time period than the 4th May should have been provided for the public to review, digest and respond.</p>
<p>91 Grove Park Tring Hertfordshire HP23 5JW</p>	<p>The proposed development is too large to be in keeping with the local area. It would be detrimental to the local environment. The proposal is in conflict with the local plan and so should not be agreed.</p>
<p>40 Windmill Way Tring Hertfordshire HP23 4HH</p>	<p>I strongly object to the planning application 22/01187/MOA.</p> <p>There are many good reasons to refuse this application, including the following points:</p> <p>1) Unplanned development.</p> <p>This application is a developer-led attempt to pre-empt the contents of the Dacorum Local Plan, which has not yet been finalised and is in flux. The National Policy Planning Framework (NPPF) paragraph 15 states that "The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area". This is a large and impactful proposal and so it is</p>

important that it has been justified within the context of a Local Plan. Clearly that is not the case here and so DBC should refuse it.

2) Destruction of Green Belt.

This application requires the release green field land within the Green Belt. This is contrary to the stated aim of national planning policy, as per NFFP paragraph 137:

"The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

NPPF paragraph 149 states "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt". It gives a list of exceptions to this principle, but importantly none of them apply to the proposed development.

NPPF paragraph 140 makes it clear that changes to Green Belt boundaries should only happen "where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans".

Paragraph 141 continues: "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."

With regard to the Green Belt, the planning application should be refused on these grounds: there has not been a justification of exceptional circumstances; it is not part of an up-to-date strategic plan; and there is no evidence that all other options have been exhausted.

3) Ineffective use of land.

The green fields upon which the application proposes to build are Grade II (very good) Agricultural Land. These fields were analysed in the DBC Interim Sustainability Appraisal (SA) of November 2020, and found to be amongst the "best and most versatile" agricultural land in the Borough and that development here would have "significant adverse effects" (SA 6.4.7). Table 5-6 of the SA shows that this site ("East of Tring") receives the lowest possible score ("The option is likely to have a significant negative effect") when assessed against the Sustainability objective "Make efficient use of land and soil".

We live at a time when weak global supply chains, a cost of living crisis, and climate change all make it important to produce food locally. High quality agricultural land is already serving an important use, and the need for new homes must be balanced against the need to feed our population.

NPPF paragraph 119, makes it clear that there is a duty to strike this balance of needs:

"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."

NPPF paragraph 120(b) explicitly names food production as a function to be taken into consideration during planning:

"Planning policies and decisions should:
(b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;"

Agricultural fields are not just "empty space". It is clear that the proposed development would have a serious negative impact on local food production. As such the application should be further rejected on the grounds of ineffective use of land and soil.

4) Unsustainability due to overdevelopment

The proposed development is far too big to be sustainable. It is utterly inappropriate to the current size of Tring, and would increase the town's population by >30%, whilst bringing thousands more cars to our roads.

The midpoint of the new suburb (>1 mile from the centre) would be at the limit of "walkability" threshold for fit adults. The reality of the situation is that it would mean more traffic on roads that are already congested. Attempts to mitigate these problems with additional bus services might well make the situation worse: large vehicles already block the High Street on a regular basis.

Other infrastructure such as town parking, train station parking, supermarkets, surgery places, school places, and allotments are already stretched and this proposal, being outside of the context of a Local Plan, can do nothing but make hollow promises about the provision of such services. As such it should be refused on the grounds of overdevelopment that would be unsustainable.

5) Negative impact on Chilterns AONB, Chilterns Beechwoods SAC & Pendley Manor

The planning application relates to green field sites directly adjacent to the Chilterns AONB. These fields form part of the buffer around the AONB, enhance its beauty and provide a gateway to and from it. A development of this size would invariably have a tremendous impact that would change the setting of the AONB forever. As the local planning authority, DBC has a duty to prevent such impacts under the Countryside and Rights of Way Act 2000 s85(1):

	<p>"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>Furthermore, the proposed development falls within the 12.6km Ashridge Commons and Woods Zone of Influence, which is there to protect the Chilterns Beechwood SAC from visitor damage. It would be irresponsible to allow a large development within this area, with the inevitable result of increased visitor numbers to the SAC.</p> <p>Lastly, the proposed development would negatively impact the rural setting of Pendley Manor.</p> <p>The application should be refused on all these grounds.</p> <p>6) Negative impact on local character</p> <p>Tring is a small market town with a strong character: high levels of walkability, William Huckvale's distinctive "Old English" architecture, a closeness to the countryside, community activities such as parades and markets. The proposed large development would erode all of these facets of Tring's character. It would create greater car dependence in the town, and water down the concentration of distinctive architecture; it would push the countryside further away from those of us who already live here, and erode the sense of community that thrives in small towns.</p> <p>Tring deserves careful stewardship so that future generations can enjoy the town in the way that we do today.</p> <p>This planning application fails in that regard, and for that reason, and all the others listed above, it should be rejected.</p>
<p>16 Nursery Gardens Tring Hertfordshire HP23 5HZ</p>	<p>The area of the application is within the Green Belt and is also valuable farm land. It does not conform to overall county/national planning considerations and a long term solution needs to be found not so called mini villages (development speak) added to a town under strain for all its services. The application is far fetched but needs to be dismissed in the strongest terms and not allowed to be watered down and passed at a later stage.</p>
<p>Chiltern Society White Hill Centre, White Hill Chesham HP5 1AG</p>	<p>The Chiltern Society is a charitable body with almost 7000 members. We campaign for the conservation and enhancement of the Chilterns National Character Area, which includes the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the London Green Belt. Our supporters are passionate about the protection of the Chilterns, which is a special area of landscape within easy travelling distance of several towns and the City of London. Much of the area is classified as both AONB and Green Belt and should receive extensive protection under the national policies in the National Planning Policy</p>

Framework (NPPF).'

The Chiltern Society strongly objects to the proposed development due to detrimental impacts on the Green Belt and the setting of the Chilterns AONB. The Society has reviewed the planning application, and the Planning Statement and Landscape and Visual Impact Assessment in particular, and has the following comments -

1. House Building is classed as 'inappropriate development' in the Green Belt. The Society opposes development in the Green Belt which fails to protect its openness or undermines its 5 purposes. These are: 'to check unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist safeguarding the countryside from encroachment; to preserve the settling and special character of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.'The proposed development would clearly be inappropriate development in the Green Belt and would be by definition harmful. Given the proposed large scale of the development, the impact would lead to substantial harm, and this would need to be given substantial weight against the development.
2. The land is currently open farmland with very few buildings. The development of 1400 homes would lead to a significant loss of openness in the Green Belt. This would also need to be given substantial weight against the development.
3. The development would be in the immediate setting of the Chilterns AONB to the north, east and south. As well as being detrimental to the AONB in terms of intervisibility, this would also add to the harm to be considered in the planning balance.
4. The proposal would lead to the permanent loss of 121ha of open agricultural land. As well as changing the open character of the land it would make the land unavailable for growing of food. In times of changing farming subsidies, reducing food miles and uncertainties with wheat supply from Ukraine, the loss of this land would be significantly harmful.
5. With nature in decline and significant changes to the climate, now is not the time to be sacrificing large areas of protected open countryside for new development. Government policy on levelling up should be reducing pressure for development in the South East and changes to the planning system are imminent but as yet not set out. This, coupled with the delay in the Local Plan, makes this application premature.
6. A development of this scale would be likely to have a significant harmful impact on the character of the town by increasing the population and the resulting traffic congestion, and losing the direct links between the existing town and the open countryside.
7. The applicant appears to be relying on the draft Local Plan to justify the proposal, and in particular that this was one of the sites considered for a housing allocation. The plan was strongly opposed

by the local community and the Council has decided not to proceed with it until further evidence has been gathered and further options considered. This, coupled with the fact that the Plan was at an early stage, mean that the emerging plan should be given little if any weight in determining the application. Decisions should be made based on the adopted Core Strategy and Local Plan. It is therefore an unallocated site in the Green Belt and should be subject to national and local Green Belt policy.

8. We do not agree with the applicant's approach to demonstrating 'very special circumstances' to allow development in the Green Belt. In our view, there needs to be an overwhelming reason why development here would 'clearly outweigh' the substantial harm to the Green Belt and the setting of the AONB. It is not sufficient to simply set out mitigation measures, which would be expected in any case, and add a little bit more. Whilst additional measures such as more Biodiversity Net Gain, more suitable accessible natural greenspace, new schools and leisure facilities can be considered as gains they cannot be considered 'very special' in order to outweigh the significant and substantial harm to a large area of Green Belt.

9. Neither Borough housing targets nor the lack of a 5-year land supply should be considered as substantive reasons for clearly outweighing harm to the openness and permanence of the Green Belt and demonstrating very special circumstances.

10. We also dispute the applicant's assertion that the site should be considered to be 'very special' because it is very large. In fact, the opposite is the case as the cumulative impact of the development proposed would be very significant and extremely harmful.

11. NPPF Para 11 states -

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Para d) i clearly applies in this case because the areas identified as being of importance are confirmed to include the AONB and Green Belt in footnote 7. The sheer scale of the loss of Green Belt provides a clear reason for refusing the application.

The applicant has also not demonstrated that the development would overcome the requirements of para d) ii as the harm to the Green Belt and the setting of the AONB clearly outweigh the benefits of the scheme.

12. NPPF Para 140 refers to exceptional circumstances in relation to changes in Green Belt. This is not relevant in this case as it relates to changes in Green Belt itself, which can only be changed as part of a Local Plan. In this respect, the land concerned in this application is currently and will remain Green Belt unless reviewed in the new Dacorum Local Plan. Accordingly, the only basis on which this application could be approved is under NPPF 146/7 which requires very special circumstances to be established."

13. We submit however, that this paragraph is not intended to apply to a wholesale redevelopment of this area, the effect of which if approved, would leave no remaining Green Belt protected land and would have the effect therefore of removing this whole area from Green Belt protection whilst still technically remaining Green Belt. 'Indeed, this proposed development is by definition inappropriate as it does not fall under any of the matters listed in NPPF 149 which only potentially accepts the listed exceptions and anything else is inappropriate. 'If NPPF 148 is applied here, then how can this development qualify given that it entails a full override of the benefits of the Green Belt; so how can it qualify as very special circumstances?'

14. A development on this scale within the Green Belt should only be promoted through the development of a new Local Plan and the demonstration of exceptional circumstances for removing land from the Green Belt. In sensitive locations such as Tring the Council should be rigidly applying a plan-led system and not allowing piecemeal applications for substantial developments.'

15. NPPF Para 176 refers to impacts on the setting of the AONB as follows -

176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

There is clear intervisibility between the site and the AONB, so the cumulative effect of the development on the setting of the AONB would be significant.

16. We are aware that the Dacorum Landscape Sensitivity Study that accompanied the Emerging Strategy for Growth consultation

assessed the site to have Moderate-High landscape susceptibility to change arising from residential and mixed-use development, and to have an overall Moderate-High landscape sensitivity. Given this assessment, the site is not suitable for this size of development and the application should be resisted. The landscape value of Site TRO3 was assessed as "high representativeness of wider landscape character: views to the Chilterns escarpment, transport corridor including the Grand Union canal, mixed open farmland, urban fringe influences around Tring including a garden centre".

17. In the absence of a new Local Plan, the decision should be taken in accordance with the Core Strategy. Core Strategy 2013 made provision for 480 new homes in Tring, including an allocation at West Tring. Tring was identified as an "Area of Limited Opportunity". In these areas, "The general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs".

The proposed development clearly conflicts with this policy and should be refused.

18. Policy CS1 Distribution of Development includes, "The rural character of the borough will be conserved. Development that supports the vitality and viability of local communities, causes no damage to the existing character of a village and/or surrounding area and is compatible with policies protecting and enhancing the Green Belt, Rural Area and Chilterns Area of Outstanding Natural Beauty will be supported".

This development would certainly not conserve the rural character of the Borough and would not comply with policies on the Green Belt, Rural Area and AONB.

19. Policy CS5 Green Belt includes, "The Council will apply national Green Belt policy to protect the openness and character of the Green Belt, local distinctiveness, and the physical separation of settlements.

There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted.

Within the Green Belt, small-scale development will be permitted..."

The development would definitely not be small scale and would be contrary to national Green Belt policy as very special circumstances cannot be demonstrated.

20. Policy CS24 Chilterns Area of Outstanding Natural Beauty includes, "The special qualities of the Chilterns Area of Outstanding Natural Beauty will be conserved".

The development would harm the setting of the AONB by impacting on view into and out of the AONB.

	<p>21. Tring Place Strategy Vision states "Tring remains a successful compact market town surrounded by farmland and delivering a high quality of life and prosperity for its residents and business community. Its built and natural heritage has been retained and enhanced. Accessibility to services and facilities has been improved, whilst promoting sustainable forms of travel.</p> <p>This has been achieved by delivering a greater range of high quality housing to suit long-term local needs that integrates with the character of the town. Small-scale business activity is encouraged and advantage taken of tourist attractions, such as the Zoological Museum, the town's green hinterland and Tring Reservoirs. Additional social facilities have also been sought for the young and elderly, with improved outdoor leisure facilities".</p> <p>Tring would no longer be a compact market town and the farmland surrounding it would be built on. The development would go totally against this adopted vision for Tring.</p> <p>22. Site Allocations 2006-2031 - The site was not allocated in the last round of sites in 2017, so must be considered as an unallocated greenfield site in the Green Belt.</p> <p>In conclusion, the Chiltern Society considers the applicant's proposal to represent 'inappropriate development' in the Green Belt and outline planning permission should be refused. We further contend that Very Special Circumstances do not exist for allowing the development.'</p> <p>We strongly object to this proposed development on Green Belt land to the east of Tring. The proposed scheme would result in the loss of open countryside, would go totally against the Council's Vision for Tring, and would adversely affect the local community. The applicant has failed to demonstrate that the benefits of the development clearly outweigh the harm that the development will cause with the loss of open countryside and its adverse impact on local biodiversity and environment."</p>
<p>Grangewood 75 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>Far too many houses for the local area, with circa 3-4 thousand people, will cause too much strain on existing stretched local facilities.</p> <p>Will permanently remove green belt land which we should be protecting for our children and theirs. Will also cause irreversible damage to local wildlife, removal of hedge rows, trees, fields.</p> <p>Traffic will be crazy, the existing roads will not cope.</p> <p>Will permanently and irreversibly damage the town of Tring.</p> <p>Will also be ugly with identikit housing plastered over our countryside.</p> <p>Do we seriously even need to comment on this in the 21st century?! It's a plan to wipe out wildlife, green space, and create additional traffic and pollution, seriously??!</p>

<p>6 Hawkwell Drive Tring Hertfordshire HP23 5NN</p>	<p>The proposed development is far too big and will cause irreversible damage to the green belt and wildlife in the area, especially being so close to Tring's beautiful canal. It will also create increased traffic and pollution. Station Road is already busy, especially during rush hour (as evidenced by the terrible state of the road). In addition, Tring cannot cope with the residents it currently has, in terms of GP services, schools, shops and parking - what will a development like this add?</p>
<p>19 Gamnel Terrace Tringford Road Tring Hertfordshire HP23 4JH</p>	<p>I write to object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chiltern Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. As an example, Tring Railway Station and its associated parking is already inadequate in relation to demand but has no scope for enlargement. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring; however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>22 Adams Way Tring Hertfordshire HP23 5DY</p>	<p>I object to the proposed development on the land east of Tring (Marshcroft) for the following reasons:</p> <ol style="list-style-type: none"> 1. This is an area of outstanding natural beauty and the proposed development is on green belt land. I understand the need for more housing, but there are brown field sites that would be better suited to this. 2. There would be an impact on local ecology. We should be looking to increase biodiversity and green spaces to reduce the effects of

	<p>climate change - not make things worse.</p> <p>3. The roads around Tring can not handle hundreds or potentially thousands of additional vehicles.</p> <p>4. Within Tring it is already difficult to get a doctors/dentist etc appointment - more houses and residents would put greater stress on these services. Equally the local supermarkets will be overwhelmed.</p> <p>5. The scale of the development is inappropriate for the size of the town. It would inevitably impact on the character of the town.</p>
<p>8 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>The proposed development is far too large for the existing character of Tring town, it's amenities and infrastructure. Tring Station is a hamlet with its own community and identity which would be swallowed up by this development.</p>
<p>10 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1 To build on green belt land and remove hedgerows and fields. This is incompatible with the government's aim to improve biodiversity. This nibbling away of ordinary green spaces is contributing to the plummeting numbers of plants and invertebrates on which our birds and other animals depend. There seems to be an general opinion that wildlife can be preserved in little islands of habitat such as nature reserves, or small areas in developments where a bit of grass and a few trees have been left. It is often assumed that open fields and hedgerows do not support any important wildlife. This is wrong. (The field adjacent to Grove Road used to support a fine selection of butterflies such as the Small Copper and Common Blue until it was ploughed up a few years ago.) All living organisms have a place in the food web which ultimately supports us. All living organisms have a right to space to live, yet it is being squeezed out of existence by increasing numbers of relatively small developments which many people believe do little or no harm. Biodiversity must be prioritised whenever a planning application is considered.</p> <p>2 To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3 To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p>

	<p>4 To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located on brownfield sites where possible and closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>Thorburn 92 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>Dear Development Management Department,</p> <p>I refer to the above and note that Planning Application (22/01187/MOA) (Application) comprises approximately 140 documents which equates to 5,500 pages, in relation to a proposed project for 1,400 houses which may well lead to a gross income of approximately GBP 1 billion.</p> <p>On any analysis, the Application has taken several years and cost the Applicant several million pounds to prepare, however, as Tenants of Grove Road in Tring we have been provided with 21 days to "Comment" on the same.</p> <p>We assume that the we and all the Tenants of Tring will be afforded a proportionate time to the Applicant to provide a full response etc to the Application going forward, however, in the meantime my wife (copied) and I object to the Application as it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring

	<p>when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. We trust the above is clear and reserve our rights.</p> <p>We look forward to your reply acknowledging receipt of the same.</p>
<p>12 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>I object to the proposed development because:</p> <ul style="list-style-type: none"> - It proposes to build on Green Belt land, adjacent to the Chiltern AONB, with no exceptional circumstances to mitigate this. - The proposal is to build on valuable high quality Agriculture land. - The number of houses proposed is inappropriate for the size and nature of Tring, is significantly more than are required, and the local roads would be unable to cope with the increases in traffic. - There are far more appropriate sites around Tring for more modest increases in housing - The development would negatively impact the views from the beautiful local countryside, take a walk along the Ridgeway from Aldbury Nowers to Pitstone Hill (for example) to appreciate this. - Any houses built should be Carbon Neutral, and include a significant proportion of low cost affordable starter homes.
<p>54 Beaconsfield Road Tring Hertfordshire HP23 4DW</p>	<p>Green Belt incursion This plan would build on green belt land. However Dacorum are currently reviewing availability of brownfield sites, in order to minimise intrusions on green belt land. Suggest this review, and subsequent revisions to local plan, should be completed before any go-ahead on this current plan for Grove Fields.</p> <p>Disproportionate development This development is disproportionate to the various services and amenities currently available in Tring. The town's High Street is narrow and always a traffic bottleneck; all current services such as doctors' surgeries and schools are already stretched to capacity. Any new infrastructure involved in this development is supposed to be provided by local authorities, but none of them have yet committed to doing so.</p> <p>Hurried timescale Planning documents total 140 and their total page count is 5,500 - surely there should be a longer period than just until 4 May for the public to absorb, assess and respond ?</p>
<p>4 New Mill Terrace Tring Hertfordshire HP23 5ET</p>	<p>To whom it may concern,</p> <p>I strongly object to the planning application (22/01187/MOA) for the following reasons: -</p>

	<p>In July 2021, the Council's Cabinet decided to defer further progress of the Local Plan until such time as further information and evidence gathered. Dacorum Borough Council are currently reviewing the availability of sites in urban areas to minimise the need to build on the green belt. This review should be completed, and the new Local Plan finalised before any green belt site is sacrificed.</p> <p>This proposal seeks to build on a green belt site adjacent to an Area of Outstanding Natural Beauty and which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). Exceptional circumstances have not been provided to justify this request.</p> <p>The scale of development is far too excessive for the current facilities and amenities that serve a small market town.</p> <p>The location of this development, so far from the town centre, will significantly increase traffic on all surrounding roads, including Marshcroft Lane, a single-track road, very popular with walkers, runners, and families, all keen to explore the beautiful countryside. In practice, the proposed extension of an existing bus service (by others), together with the introduction of cycle routes, will not prevent or mitigate this increase in road traffic.</p> <p>There are other sites, closer to Tring town centre and A41, which are more suitable for development to provide a smaller, more proportionate and sympathetic increase to Tring's existing population.</p>
<p>Ladyman Barn Stocks Road Aldbury Tring Hertfordshire HP23 5RU</p>	<p>I object to the planning application (22/01187/MOA) because :</p> <ul style="list-style-type: none"> - Permission to build on Green Belt land, which is also adjacent to the Chilterns Area of Outstanding Natural Beauty, should be refused. No "Very Special Circumstances" have been put forward to justify the damage to the Green Belt. The land is also much needed grade 2 agricultural land. - Development is not permitted in view of the Chilterns Beechwoods SAC Development Restrictions. The offer to provide a suitable alternative natural green space is not an adequate mitigation. - It is not acceptable to build on a scale that is inappropriate to the current size of Tring. This proposed development, plus Roman Park, would increase the population of Tring by 34%, which would overwhelm the capacity of this historic market town forever. The proposed development would also have a serious impact on Aldbury Parish, in particular on the hamlet of Tring Station (the West Ward of Aldbury Parish). Difficulties of access to, and parking at, the railway station itself would be exacerbated. - There is no commitment from principal authorities and the NHS to fund additional infrastructure, e.g. new schools and health centres. - Dacorum Borough Council should be seeking alternative brownfield sites and should finalise the new local plan in accordance with

	<p>evolving government guidelines, before Green Belt land is sacrificed. If necessary, location Tr01 should be first be considered as a more appropriate site for development.</p>
<p>Bonakanda 55 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>This land is Green Belt and close to an AONB. It is marshy and floods regularly. It provides the only direct access to genuine open green space for disability groups. The alternative, Tring Park, can only be accessed by steps.</p> <p>Access to green space is needed for mental and general health wellbeing. Introducing 4,000 to 5,000 people and homes and cars, pollution and noise into this space will remove that access, and peace. No amount of mitigation, or intention to section off a small area close to the canal, which will be mainly "flood" ponds will replace this.</p> <p>The last local plan was rejected and has not yet been re-written, so no evidence is available that these houses are needed locally. It is ridiculous to consider additional housing of this proportion in isolation, when new houses are being built in and around Tring already at a great rate.</p> <p>Tring is a small town with no room to expand centrally to provide for a 25% increase in population. It already has very high density housing and is very short of local facilities, particularly health, having lost its health centre to housing a few years ago.</p> <p>Tring also has very little employment opportunity, or space for new businesses, so new settlers here will undoubtedly be driving elsewhere for work, adding to pollution and congestion.</p> <p>There is no explanation of how Marshcroft Lane would be for pedestrians and cyclists, but would have a junction with the main traffic through the village.</p> <p>This predatory application is merely a means to make money from land bought speculatively by companies with no connection to Tring, or interest in the well-being of our town and people.</p> <p>The company will have no legal obligation to provide services to a massive influx of people and families. They cannot guarantee the provision of any of the additional services that a new stand-alone village would need. They will have no ongoing obligation once the houses are sold and the Tring community will suffer even more than it currently is doing, especially with access to GPS and Dentists.</p> <p>The car and bus route that winds through the housing from Bulbourne Road to Station Road will be a traffic nightmare and lead to cars using alternative route along Grove Road where there is a primary school.</p> <p>If Tring is in need of affordable homes for people who work in Tring, but can't live here, then more social housing is the answer, not "affordable" homes which are actually expensive, but the owner gets to mortgage 25% and rent 75%. That is no solution.</p> <p>Dacorum council must reject this plan and work on improving the lives</p>

	<p>of people and housing under its remit. It should firmly reject this predatory application and concern itself with investigating how an innovative local plan can be forward-thinking in the light of climate change.</p>
<p>60 Dundale Road Tring Hertfordshire HP23 5BU</p>	<p>Please do the right thing and reject this request. The land is green belt for a reason.</p>
<p>9 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>The planned development is on greenbelt land and on Grade 2 agricultural land which needs to be saved and used for UK food production. The number of houses proposed is an over development of the town and will increase the population of Tring substantially. The infrastructure and road systems cannot cope with this and no changes are shown in the plan to deal with it. The proposed schools and doctor surgery are not the responsibility of the developer and there is no allocated budget to build or run them.</p> <p>The proposed site is on the edge of an AONB zone and it will impact on wildlife in the zone and on the canal banks below the site. Many species will be threatened by this development.</p>
<p>47 Highfield Road Tring Hertfordshire HP23 4DS</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>Ivy Cottage Station Road Tring Hertfordshire HP23 5QY</p>	<p>I object to this planning application for the following reasons: The proposal is to build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. It would also be built on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. The scale of the development is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>Melita 43 Grove Road Tring Hertfordshire HP23 5PD</p>	<p>I object to this development within the Tring area for the following reasons:</p> <ul style="list-style-type: none"> - There are currently a number of developments within the Tring area the effects of which on the community and town resources are yet to be felt. Developments such as Roman Park with some 270 houses, the additional properties at both ends of the Bulbourne Road, the new flats along Wingrave Road and the proposed new flats in Mortimer Hill being the main ones. - The road network within Tring is already overburdened. Many of which, although being bus routes, are at times restricted to single track roads due to parked cars. Station Road is one such road that will provide access for this proposed development to the A41 will have to cope with this increase in traffic. - The proposed site for this development is on land that is designated Green Belt and is adjacent an Area of Outstanding Beauty. Tring has already sacrificed one parcel of Green Belt land to Roman Park and further erosion Trings Green Belt seems disproportionate.

	<p>- The objections to the loss of this open space are not just restricted to residents of Tring. Those that use this space for recreation will be aware that visitors arrive from as far as London and Oxford to enjoy this natural habitat.</p>
<p>11 Railway Cottages Station Road Tring Station Tring Hertfordshire HP23 5QT</p>	<p>1 Permission to build on Green Belt land, which is also adjacent to the Chilterns Area of Outstanding Natural Beauty, should be refused. No "Very Special Circumstances" have been put forward to justify the damage to the Green Belt. The land is also much needed grade 2 agricultural land.</p> <p>2 Development is not permitted in view of the Chilterns Beechwoods SAC Development Restrictions. The offer to provide a suitable alternative natural green space is not an adequate mitigation.</p> <p>3 It is not acceptable to build on a scale that is inappropriate to the current size of Tring. This proposed development, plus Roman Park, would increase the population of Tring by 34%, which would overwhelm the capacity of this historic market town forever. The proposed development would also have a serious impact on Aldbury Parish, in particular on the hamlet of Tring Station (the West Ward of Aldbury Parish). Difficulties of access to, and parking at, the railway station itself would be exacerbated.</p> <p>4 There is no commitment from principal authorities and the NHS to fund additional infrastructure, e.g. new schools and health centres.</p> <p>5 Dacorum Borough Council should be seeking alternative brownfield sites and should finalise the new local plan in accordance with evolving government guidelines, before Green Belt land is sacrificed. If necessary, location Tr01 should be first be considered as a more appropriate site for development.</p>
<p>5 Thomas Gardens Tring Hertfordshire HP23 5FN</p>	<p>I very much object to the planning application 22/01187/MOA because of the following reasons:</p> <p>1. The plan includes building on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Further to this, Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt. Surely, this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed</p> <p>2. The plan shows that the intention is to build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon</p> <p>3. I feel the scale of the build is inappropriate given the current size of Tring. This development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and</p>

	<p>change the character of this historic market town forever</p> <p>4. The proposal mentions additional infrastructure such as new schools and health centres. However, this would be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS and there is currently no commitment from these public bodies to do so</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>6 New Mill Place Tringford Road Tring Hertfordshire HP23 4FF</p>	<p>I am writing to strongly object to the planning application 22/01187/MOA because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. 6. I am considerably worried about the increase in traffic and the inherent pollution that will bring. The air pollution and noise pollution on Bulbourne Road is already horrendous that road is already a dangerous road for pedestrians both in physical terms (a tiny narrow footpath traffic hurtling by at speed) and air and noise pollution add to that the increases that will be brought by the site traffic during development not to mention the probable arrival of thousands of cars belonging to the new home owners.

<p>The Timbers Lower Icknield Way, Marsworth TRING HP23 4LN</p>	<p>Such a huge development will totally change the character of Tring, and the area. Schools, doctors, dentists, Station parking, and other local services are all hopelessly inadequate to support such a development. The location is too close to the Chiltern AONB and its development will severely impact that protected environment.</p>
<p>2 Ashcroft Terrace Nathaniel Walk Tring Hertfordshire HP23 5DQ</p>	<p>I am writing to object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>18 Christchurch Road Tring Hertfordshire HP23 4EE</p>	<p>I object to the planning application (22/01187/MOA) for the following reasons:</p> <p>This is green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should</p>

	<p>be finalised before any green belt is sacrificed.</p> <p>This is land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>The scale of this proposed development is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34% - this would change the character of this historic market town forever.</p> <p>There is no commitment from the authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS to provide the additional infrastructure e.g. new schools and health centres</p> <p>I believe that any development should be more proportionate to the size of Tring.</p> <p>On a final note, due to the scale of planning application documents (over 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>9 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>

<p>Combpayne Icknield Way Tring Hertfordshire HP23 5HJ</p>	<p>The development will change the character of Tring and put a huge strain on already over subscribed resources such as schools, GPs, parking.</p> <p>The land is green belt and should not therefore be built on as it will destroy the natural habitat of hundreds of species.</p> <p>o build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will have less impact on the environment.</p> <p>The 500 bus service to Aylesbury is already overcrowded at school times and the traffic into Aylesbury means a car journey can take 30-40 mins at peak time. Both of these will be made worse by the planned development.</p>
<p>8 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>This plan will massively increase the number of houses and number of residents of Tring, fundamentally changing the character of this historic market town. It doesn't take into account the needs or feelings of existing residents and of the existing town. It is far too big for Tring and is out of balance with locals' needs for new houses. Local people value their green space! It should also be considered in tandem with the other planned developments, which together will increase Tring by >50% which is not sustainable and not serving the town well.</p> <p>The land is currently Green Belt, and the legislation says it can only be reclassified if there are "very special circumstances". I don't believe this definition has been reached. Tring does not need 1400+ new houses. Maybe Dacorum does, but not Tring.</p> <p>I am concerned about the density of housing on this land. 1400 homes is probably in the region of 4000 more bedrooms, equating to 4000 more people. I do not think that that many people can be adequately housed on the land, with space for all of the rewilding, green spaces, and flood mitigation that the plan promises. However, it is hard to tell because the plan does not contain details of the housing developments, the area, etc.</p> <p>Although the fields themselves are not within the AONB, they are completely surrounded by AONB land, and development will have an adverse impact on the views and the character of the Area.</p> <p>This land is part of the waterways system and is an important flood plain. Building on the land will increase the risk of flooding for both the development and the surrounding areas. Even with flood-mitigation plans in place, 1400 homes plus parking spaces and infrastructure will replace absorbant land with artificial surfaces for rain run-off.</p> <p>The roads north and south of the development are both small with congestion issues. They are single carriageways away from the main arterial routes of the A41. They cannot cope with 1400+ new cars, even if not everyone is driving at the same time. There will still be</p>

	<p>many more cars in the local area than there are now.</p> <p>Similarly, can our local freshwater and sewerage system cope? That's a lot of people drawing more water, and emitting more waste into the system.</p>
<p>34 Goldfield Road Tring Hertfordshire HP23 4AZ</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>26 Bunyan Close Tring Hertfordshire HP23 5PS</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable</p>

	<p>location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>4 Fog Cottages Tring Station Tring Hertfordshire HP23 5QP</p>	<p>We object to this development. it is in a green belt zone and close to the AONB , Ashridge estate and Sites of special scientific interest. The existing roads leading to and from the development are not suitable for existing traffic. The fields are prone to severe flooding. A high pressure fuel line runs through the development. A lack of drinking water may be an issue as local water is drawn from aquifers. There are not enough existing facilities and the facilities promised on the plan have not been given enough thought. Who is going to run the schools and where are the medical facilities to provide for extra people? Tring is stretched for these facilities presently. The houses will not address the need for local starter homes at a reasonable price for local key workers. The over development of the area will spoil Tring as an attractive place for visitors to the area , which is a key part of the local economy. Although Tring and Berkhamsted have a bypass, in the event of it being closed the A4251 is at a gridlock for many miles. More cars will add to the congestion and air pollution. With Aylesbury vale council very heavily over developing houses towards Aston Clinton and Pitstone, so that residents can take advantage of Dacorum and Hertfordshire facilities, it will also cause ribbon development from the other side of Aylesbury through Berkhamsted to Watford. HS2 is being built and destroying local green spaces so employment and housing can be moved further north to aid the economy, rather than a north south divide. Putting more houses in the south east so that developers can increase their profits makes no sense.</p>
<p>65 Dundale Road Tring Hertfordshire HP23 5BX</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1) To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2) To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. There is already pressure on and damage to the Ashridge Estate from an increase in housing locally. 3) To build on a scale that is inappropriate to the current size of Tring

	<p>i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4) Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5) To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. We do not need a suburb.</p> <p>6) To build on an area that has historically been prone to flooding. The "marsh" in "Marshcroft" gives a clue to this. Station Road is also on a flood plain.</p> <p>7) To build on Grade 2 Agricultural land. Farming is a far more effective use of this land at a time when food production is going to be needed more closer to home rather than imported from elsewhere.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>Lynton 118 Western Road Tring Hertfordshire HP23 4BJ</p>	<p>Dear Sir/ Madam,</p> <p>I write to you to register my concern and disapproval about the proposed development of 1,400 homes at "Grove Fields".</p> <p>I am a recent arrival in the town, having moved here from Watford- a much larger town being altered out of all character by ridiculous targets for new dwellings, in December 2020.</p> <p>Already under construction back then was the Roman Park development at the Western extremity of town.</p> <p>I thought I'd outline my own personal concerns about the proposal first, before reinforcing the objection from the Grove Fields Action group.</p> <p>Tring is a special town, nestled amidst and against the Chiltern Hills, it has a special charm which has evolved over its long history.</p> <p>Imagine how the High Street would be impacted by the extra traffic generated by the Grove Fields proposal! Even yesterday (23/4) a small set of roadworks caused significant queuing and traffic noise along its length.</p> <p>The town is surrounded by areas of great natural wealth and beauty, and these already come under pressure from recreational use by local residents and incoming visitors from further afield.</p>

	<p>With specific reference to Tring Reservoirs, Ivinghoe Beacon and Aldbury Nowers (of almost unique importance for insect life), all these would be severely impacted by additional population pressure from Tring.</p> <p>I include here the concise and detailed objections drafted by others, but with which I wholeheartedly concur.</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>Yours Sincerely,</p>
<p>19 Gannel Terrace Tringford Road Tring Hertfordshire HP23 4JH</p>	<p>Dear Sirs</p> <p>I write to object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chiltern Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is

	<p>inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring; however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>27 Morefields Tring Hertfordshire HP23 5EU</p>	<p>Only an overview can be provided of our objections to this application. However other responses are providing some detail of the problems that this scale of development poses for a small market town.</p> <p>Location: Development should not be considered for Green Belt and Grade 2 Agricultural Land.</p> <p>Large adverse impacts on Biodiversity and Impacts will result on The Chilterns Beechwoods SAC, and other local areas of nature conservation interest. The recent correspondence from Natural England following on from the piece of evidence instructed by Dacorum Borough Council and completed by Footprint Ecology of the existing local impacts in the area provides some degree of acknowledgement of the scale of degradation suffered by the SAC currently. Existing visitor estimates for the Ashridge Estate are acknowledged in the Natural England correspondence to be an underestimate so it is unclear how a strategic solution can be found to allowing large scale development.</p> <p>However it is clear that whatever strategic response is agreed with Natural England it will not be enough. The results from the existing population levels are leading to a deterioration in the SAC. Of course some mitigation measures can be implemented to reduce impacts from the existing local population. However whatever "strategic solution" is devised to facilitate large scale development will be totally inadequate to prevent further degradation and loss of biodiversity.</p> <p>There is no guarantee that a "strategic solution" can be found to allowing large scale development and the resultant large adverse impacts on the area so a decision to allow development would be premature.</p> <p>The scale of the development is totally unsuitable for a small market</p>

	town with infrastructure already insufficient for the community needs.
2 Fog Cottages Tring Station Tring Hertfordshire HP23 5QP	This is green belt land that should not be developed and is on the edge of a AONB.
Herts and Middx Wildlife Trust, Grebe House St Michaels Street St Albans AL3 4SN	<p>In order to scrutinise the figures in the biodiversity net gain assessment, the full metric in excel form must be supplied. The application should not be determined without this information. Small changes to species lists and management required. Condition for a biodiversity net gain management plan required to secure habitats outlined in the approved metric. Hedgerow provision required offsite or via a S106 to deliver a 10% net gain in linear habitats. Condition required for integrated swift and bat boxes required.</p> <p>Changes are required to the management of proposed habitats to achieve the intended results.</p> <p>The Landscape and Biodiversity Management Plan should be altered:</p> <p>Remove London Plane from the tree planting mix, it is not native. Remove Scots Pine, not appropriate for this area.</p> <p>Hay meadow management involves cutting and clearing twice a year in mid July and October, not once as has been stated. Change Table 5.7 p24 to reflect this.</p> <p>The biodiversity net gain metric shows an acceptable net gain in terrestrial habitats but not in hedgerows. There should be a 10% net gain in hedgerow habitat. If this cannot be delivered on-site it should be provided offsite or via a S106 agreement with the LPA to deliver it on their behalf.</p> <p>The outputs of the biodiversity metric should be secured by a suitably worded condition. This must require a biodiversity net gain plan that demonstrates how the specific habitat units detailed in the metric will be achieved. The plan should link directly to the metric with the number of units explicitly stated for each habitat parcel, together with the establishment, management and monitoring measures required. Contingency in case of failure must also be detailed. A suitable condition is:</p> <p>'Development shall not commence until a Biodiversity Net Gain Management Plan (BNGMP) has been submitted to, and approved in writing by, the local planning authority. The content of the BNGMP shall ensure the delivery of the agreed number of habitat units identified in the approved NE biodiversity Metric (insert unit total here) as a minimum to achieve a biodiversity net gain. The BNGMP must include the following.</p> <p>a) Description and evaluation of features to be managed. b) Aims and objectives of management. c) Appropriate management options for achieving target condition for all habitat parcels as described in the approved metric.</p>

	<p>d) Prescriptions for management actions, only definitive measures are acceptable.</p> <p>e) Preparation of an annual work schedule capable of being rolled forward in perpetuity, with habitat land parcels clearly marked on plans.</p> <p>f) Details of the body or organisation responsible for implementation of the plan.</p> <p>g) Ongoing monitoring plan and remedial measures to ensure habitat condition targets in the approved metric are met.</p> <p>h) Details of species selected to achieve target habitat conditions as identified in approved metric, definitively stated and marked on plans.</p> <p>The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery.</p> <p>The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme.'</p> <p>Reason: To achieve a measurable biodiversity net gain in accordance with NPPF.'</p> <p>All houses bordering open space should incorporate an integrated swift and bat boxes. The following condition should be applied to secure this:</p> <p>'Prior to the commencement of the development, details of 400 integrated bat cavity boxes, and 400 integrated swift boxes, shall be submitted to and approved in writing by the local planning authority. The approved measures shall be incorporated into the scheme, be fully constructed prior to occupation of the approved development and retained as such thereafter.'</p> <p>Reason: To conserve and enhance biodiversity in accordance with NPPF.</p>
<p>Woodstock 56B Grove Road Tring Hertfordshire HP23 5PD</p>	<p>This plan will massively increase the number of houses and number of residents of Tring, fundamentally changing the character of this historic market town and is effectively linking the hamlet that is Tring Station with the remainder of Tring. Harrow Estates claim to have consulted on the matter and whilst they held an exhibition in town they did not record attendees comments or observations at the event and requested feedback forms be completed. I was then invited to join a working group to discuss the proposals and submit my thoughts but having indicated an interest, my further requests were met with silence and as far as I am aware no meaningful or representative workshops ever took place.</p> <p>The development is out of balance with local needs for new houses. Local people value their green space and Marshcroft Lane is a valued natural green route for the locality.</p>

The land is currently Green Belt, and from the documentation submitted with this application the "very special circumstances" required to permit development on Green Belt land have not been met. Tring does not need 1400+ new houses.

The proposals make no reference to additional utilities required to serve an estate of this size. The electricity power network for Tring cannot support this development without extensive works elsewhere in the Tring area, the water and drainage networks are currently overstretched and also cannot support a development of this size without enlargement of existing facilities elsewhere in the locality.

Development will have an adverse impact on the views and the character of the Area and the views of the higher ground will be adversely impacted from Tring whilst the views of Tring from the high ground surrounding Tring will be adversely affected. The land currently serves as a green buffer between the town and the canal/railway and with the A41 restricting development towards Tring Park, the development will remove all accessible green areas.

Concerning the documents submitted, the applicant has provided a built heritage statement but this make no reference to the archaeological survey completed which has recorded Iron Age remains, ditches and settlements on the site. There is also no reference the crop marks which are present and visible in dry weather from surrounding high ground.

The ecological assessment makes only passing reference to bats in Marshcroft Lane at, before and soon after sunset. There are known maternity roosts in the buildings around the Marshcroft Farm who forage in and around the ditches and woodland and these protected species cannot be relocated. The claim that no dormouse, hedgehogs or badgers are present suggest the survey has been hastily completed or done to avoid any sightings as this and many other wildlife species are visible in the development area.

The roads north and south of the development are single carriageway with congestion issues. and they cannot cope with the number of new cars likely. Access to the A41, towards Dunstable, Aylesbury, Hemel Hempstead or other potential sources of employment are already constrained by the road layout and restrictions imposed with a traffic light controlled bridge over the railway and a narrow canal bridge on Icknield Way, narrow roads leading to the A41 and dangerous junctions which require care and cannot support a large influx of additional traffic.

Tring does not have the community facilities to support a development of this scale. The development proposes new school, community and sports facilities and proposes 1000m² of new shops and services floor space including a day nursery. This is totally inadequate to support the proposed development and will result in pressure on existing facilities in the town. Whilst Tring has two existing supermarkets, neither are capable of supporting additional development of this magnitude and the existing market town shops within Tring are unable

	<p>to support this development.</p> <p>In short, the proposals are a massive overdevelopment of the market town that is Tring and will adversely affect the setting of the town in an Area of Outstanding Natural Beauty and I strongly oppose the development.</p>
<p>19 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>I would like to register, in the strongest possible terms, my objection to this application which would have an extremely detrimental effect on the Chiltern countryside, the AONB and the market town of Tring. The whole site is in designated Green Belt which should only be released for development in exceptional circumstances. We cannot afford loss of our Green Belt especially with so many alternative brownfield sites available for development within the Borough.</p> <p>It is unethical that these developers seek to take advantage of the fact that the planning framework for the area is still in the process of being developed by our elected representatives.</p> <p>Further, the detail of the hybrid application is purely illustrative and so provides no firm basis for assurance of the eventual project.</p> <p>I urge Dacorum Borough Council to reject this application outright.</p>
<p>13 Bulbourne Road</p>	<p>I am writing to strongly object to the planning application 22/01187/MOA because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>52 Hunters Close Tring Hertfordshire HP23 5QA</p>	<p>Exceptional circumstances have not been identified to justify approval of the application to build on this green belt site, which is also adjacent to an Area of Outstanding Natural Beauty. Dacorum Borough Council is currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt. This review should be allowed to complete, and the new local plan should be finalised before any decision is made to sacrifice green belt here or anywhere in the borough.</p>
<p>49 Grove Park Tring Hertfordshire HP23 5JS</p>	<p>Dear Sirs,</p> <p>I am writing to object to planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>The run off of water with added phosphates and Nitrates that will no doubt enter the local watercourse will always be a problem.</p> <p>I am not against housing growth for Tring, however, I believe it should</p>

	<p>be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>43 Grove Road Tring HP23 5PD</p>	<p>I would like to take this opportunity to OBJECT to the planning application for additional 1400 new homes in Tring, as detailed below:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>4 Fairthorn Close Tring Hertfordshire HP23 4DT</p>	<p>Since I moved to Tring in 1978 repeated efforts have been made by developers to build MANY houses here. They would totally alter and ruin Tring. So far all of them have been denied.</p> <p>The structure of Tring is not suited to a large development. The infrastructure could not cope. Have you seen our high street? Do you live in Tring? I expect the answer is "no". We already have a development on the Icknield Way, Roman Park, of 240 houses i.e a possible 960 extra people and 480 cars? These will already cause more problems.</p> <p>I have already tried to send an email to this address. It was returned 3 times. I hope that this one gets through</p> <p>.We already have the Roman Park development going up with approximately 240 houses, a possible extra 480 cars and 960 people.</p>

	<p>An extra 1,700 houses will overwhelm the town. Where will they park? How will they use the station ?There is no extra parking available there An even larger development would only make these problems much, much worse. Tring will be paralised.</p> <p>How will the surgeries cope with a larger number of residents.</p> <p>This will mean that more green belt will disappear for ever.</p> <p>The high street is blocked one way if only one vehicle parks there.</p> <p>Miswell lane, already a difficult road, will be made worse by the Roman Park estate being built. There is rumour of a possible Residential Home being built there. There is no room for cars etc to go in and out of a building based on the top of Miswell Lane.</p> <p>At the ;moment Tring is a nice place to live, a small market town. These plans would change its character and turn it into a blocked up, overcrowded and unpleasant .place to live. It will become a commuter town. There will not be enough work, parking,or medical surgeries to cope with more people.</p>
<p>8 Mortimer Hill Tring Hertfordshire HP23 5JT</p>	<p>I am emailing you to register my strongest objections to the planning application 22/01187/MOA. This is Green Belt/AONB land and deserves protection for that very reason. With the declaration of a climate and ecological emergency by DBC I find it hard to stomach that these plans even have to be considered? This proposed development is too large, and our infrastructure will not cope with it. The character of our historic market town will be forever lost.</p>
<p>11 Netherby Close Tring Hertfordshire HP23 5PJ</p>	<p>I am the Chairman of the Grove Fields Residents Association (GFRA). The GFRA objects to the planning application (22/01187/MOA), the GFRA objection is on behalf of our 572 members who are all residents of the local area. Please find attached our response to Dacorum's 'Issues and Options' consultation in 2017 and 'Draft Local Plan Consultation' in 2021. Both of these responses provide significant reasoning as to why this land should not be developed and I therefore submit them as evidence to be considered by Dacorum Borough Council and any subsequent appeals process.</p> <p>The headlines as to why the GFRA objects to this planning application are because it proposes:</p> <p>1) To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2) To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides</p>

	<p>protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3)To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4) Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5)To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>116 Western Road Tring Hertfordshire HP23 4BJ</p>	<p>Hi there</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.

	<p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>8 Sulgrave Crescent Tring Hertfordshire HP23 5LG</p>	<p>To whom it may concern,</p> <p>I am writing to express my strong objections to planning application 22/01187/MOA for 1,400 housesp to the east of Tring.</p> <p>I have several detailed objections, which are given below, but would also like to raise some more general objections to the plan as a whole.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). There is local support for additional, affordable housing but this has to be proportionate to the size of the Town and should be on brownfield sites, infill or on sites closer to the centre of Town, such as the Herts CC owned land opposite the Tesco supermarket rather than irreplaceable Green Belt.</p> <p>In addition, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p> <p>My detailed objections to planning application 22/01187/MOA are as follows:</p> <ol style="list-style-type: none"> 1. The proposal is to build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. The proposal is to build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland upon which the proposal is planning to develop houses. 3. The proposal is to build on a scale that is disproportionate to the current size of Tring. This development,

	<p>plus Roman Park in the west of Tring, increases the population of Tring by 34%, which will overwhelm the capacity of local infrastructure and forever change the character of this historic market town.</p> <p>4. The proposed additional infrastructure, including new schools and health centres promised by the Developer are unfunded. The assumption is that these are to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. The proposed access to this very large development are from Bulbourne Road and Station Road, with the Developer envisioning little or no impact on surrounding roads, notably Grove Road. At the community event they held, it was proposed that a section of Marshcroft Lane be made one way to avoid this becoming the main access, but doubts were expressed on this plan by the Developer themselves due to the need to provide access for existing householders on Marshcroft Lane. It seems naive to expect that traffic from the west of Tring, particularly School traffic, will only use the designated access points and not simply use Grove Road, Chiltern Way and Mortimer Hill as access, pick up and drop off points. This will greatly impact an area already very congested with traffic at each end of the school day.</p> <p>6. The proposal is to build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>In summary, I object to 22/01187/MOA on all of the above grounds and support the advice from Tring Town Council to the Dacorum Planning Authority to reject the application in the strongest possible terms.</p>
<p>1 Sulgrave Crescent Tring Hertfordshire HP23 5LG</p>	<p>Dear Planning Department, I strongly object to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of</p>

	<p>this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am very much not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>Georgia Trooper Road Aldbury Tring Hertfordshire HP23 5RW</p>	<p>I am informed that the development proposed: Is on Green Belt land (there was good reason for this designation in the context of maintaining open spaces and providing an alternative would be missing the point), is on Grade 2 agricultural land (the country cannot afford to give up higher quality land that is needed for food production at a time when we are realising that global food supply chains are increasingly threatened), will impact on an Area of Outstanding Natural Beauty (again, there was reason for this designation and the area concerned has been described to me by a Council officer as the jewel in Dacorum's crown), is within the Ashridge Commons and Woods Buffer of the Chilterns Beechwoods Special Area of Conservation It seems inappropriate and irresponsible to allow development on this land when alternative sites are available (albeit may be not in the control of this developer).</p> <p>Recognising that you may chose to set aside the objections given above, I ask that you take into consideration that the present centre of Tring is not readily accessible on foot from the proposed area of development (think of a parent with small children). At a time when we are all trying to live more sustainable lives it is important that new developments have community facilities within easy walking distance. These should include but not be limited to shops, schools, medical surgery, places of faith gathering, a community hall, pub(s). These are referred to in the application, but experience tells me that they are often overlooked when developments go ahead; the Council needs to be ahead of the game on this matter.</p> <p>While there is reference to Affordable Housing, there is only slight reference to Social Housing - that is, housing that is, and remains in public ownership and is available for the least well off. This reference needs to be considerably strengthened - and to Dacorum's advantage.</p> <p>On the subject of sustainability I have seen no reference to energy</p>

efficient building standards. This is a lost opportunity for Dacorum to establish housing construction standards for the future that will benefit future generations of residents.

There is also no reference to the provision of public transport in the summary document. Again referring to the need to lead more sustainable lives with fewer cars, this is a serious omission in the application.

Dear Sirs,

Ref the above planning application, please note:

I am informed that the development proposed:

- o Is on Green Belt land (there was good reason for this designation in the context of maintaining open spaces and providing an alternative would be missing the point),
- o is on Grade 2 agricultural land (the country cannot afford to give up higher quality land that is needed for food production at a time when we are realising that global food supply chains are increasingly threatened),
- o will impact on an Area of Outstanding Natural Beauty (again, there was reason for this designation and the area concerned has been described to me by a Council officer as the jewel in Dacorum's crown),
- o is within the Ashridge Commons and Woods Buffer of the Chilterns Beechwoods Special Area of Conservation

It seems inappropriate and irresponsible to allow development on this land when alternative sites are available (albeit may be not in the control of this developer).

Recognising that you may chose to set aside the objections given above, I ask that you take into consideration that the present centre of Tring is not readily accessible on foot from the proposed area of development (think of a parent with small children). At a time when we are all trying to live more sustainable lives it is important that new developments have community facilities within easy walking distance. These should include but not be limited to shops, schools, medical surgery, places of faith gathering, a community hall, pub(s). These are referred to in the application, but experience tells me that they are often overlooked when developments go ahead; the Council needs to be ahead of the game on this matter.

While there is reference to Affordable Housing, there is only slight reference to Social Housing - that is, housing that is, and remains in public ownership and is available for the least well off. This reference needs to be considerably strengthened - and to Dacorum's advantage.

There is also no reference to the provision of public transport in the summary document. Again referring to the need to lead more sustainable lives with fewer cars, this is a serious omission in the application.

	<p>Again, on the subject of sustainability I have seen no reference to energy efficient building standards. This is a lost opportunity for Dacorum to establish housing construction standards for the future that will benefit future generations of residents.</p>
<p>The Farmhouse Marshcroft Lane</p>	<p>To whom it may concern,</p> <p>Re the above planning application -</p> <p>o I strongly object to these proposals and request Dacorum Borough Council refuse this application, which would have such an extremely detrimental effect on our Chiltern countryside, its AONB, the Borough and the market town of Tring.</p> <p>o This site falls within the Chilterns Beechwoods Special Area of Conservation (SAC) - March 2022. I understand that DBC is required to implement mitigation to alleviate visitor pressure on Ashridge and Tring Woodlands. This site falls within the Zone of Influence and should be protected from development of any kind.</p> <p>o The size of the proposed development is far greater than is appropriate for the present size of the town, which has already been extended recently by a large housing development on its Western edge.</p>
<p>13 New Road Wilstone Tring Hertfordshire HP23 4NZ</p>	<p>To whom it may concern.</p> <p>I strongly object to this development. It is contrary to many local and national planning policies as well as being wholly situated in green belt.</p> <p>I am particularly concerned that the developers state that there are very special circumstances for granting planning permission, stressing the lack of 5 year housing supply by dacorum. This is a frequent method to get planning by appeal to the secretary of state after local refusal. It is important to address this.</p>
<p>St Brannoeks 83 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>We object to further loss of Green Belt Land. The Green Belt is there to preserve the identity of separate developments, originally considered as "breathing space". Bleeding Tring into the hamlets of Bulbourne and Tring Station does not deliver a "sustainable community that will seamlessly integrate with Tring" (Summary Guide, para 3.1).</p> <p>The threat of overdevelopment must also be rejected due to its damage to Tring's relationship with nearby Areas of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC). The plan's provision of Suitable Alternative Natural Green Space (SANG) will not protect the beechwoods from further damaging recreational pressure, as people will not confine themselves to this development.</p> <p>Were this Grade 2 agricultural land to be lost, more of our food security would be gone forever. In a world where we are reconsidering the impact of "food miles" surely this is a serious loss.</p>

	<p>The roads north and south of the development are single carriageways with congestion and access difficulties which would worsen with extra traffic. Traveling to nearby towns from the north of the planned development for employment, and elsewhere for leisure, is already problematic with a traffic light controlled bridge over the railway and a narrow canal bridge on Icknield Way near the Grand Junction pub. Both can only take one-way traffic.</p> <p>The chicane by the industrial area on Brook Street suffers serious congestion currently. In order to access the A41 traffic from this new estate will just add to the current chaos.</p> <p>The new developments in Pitstone already impact station road as traffic accesses the A41. Additional traffic would make it even more difficult to leave Grove Road or Cow Lane.</p> <p>It is the county council that provides schools. A development of 1400 dwellings could not support a new secondary school - that land would be used to further inflate the population. (A bit odd considering Tring School is going through a major upgrade. Not the best example of joined-up thinking).</p> <p>The impact of over 200 homes to the west of our pressurised Tring has yet to be felt fully, but at least access to the A41 is easily achieved without the need to drive through the town centre. In addition, the new residents can walk 15 minutes and be on the high street. Something residents of new suburb would not be able to, adding to traffic and pollution.</p> <p>The infrastructure is already at breaking point e.g.:</p> <ol style="list-style-type: none"> 1. The main doctor's surgery has a tiny car park and barely copes with its existing customer base. 2. Tring Station car park (pre-Covid) was full before 8am, causing people to drive to other stations on the line to Euston. 3. Tring's car parks can hardly cope at busy times eg weekends. 4. The narrow High Street's pavements are cramped, often forcing pedestrians into the road in order to pass.
<p>9 Bunyan Close Tring Hertfordshire HP23 5PS</p>	<p>I strongly object to this proposed development. It is far too big for the size of the town, and the proposed site is green belt land.</p>
<p>Ladyman Barn Stocks Road Aldbury Tring Hertfordshire HP23 5RU</p>	<ol style="list-style-type: none"> 1 Permission to build on Green Belt land, which is also adjacent to the Chilterns Area of Outstanding Natural Beauty, should be refused. No "Very Special Circumstances" have been put forward to justify the damage to the Green Belt. The land is also much needed grade 2 agricultural land. 2 Development is not permitted in view of the Chilterns Beechwoods SAC Development Restrictions. The offer to provide a suitable alternative natural green space is not an adequate mitigation. 3 It is not acceptable to build on a scale that is inappropriate to the current size of Tring. This proposed development, plus Roman Park, would increase the population of Tring by 34%, which would overwhelm the capacity of this historic market town forever. The proposed development would also have a serious impact on Aldbury

	<p>Parish, in particular on the hamlet of Tring Station (the West Ward of Aldbury Parish). Difficulties of access to, and parking at, the railway station itself would be exacerbated.</p> <p>4 There is no commitment from principal authorities and the NHS to fund additional infrastructure, e.g. new schools and health centres.</p> <p>5 Dacorum Borough Council should be seeking alternative brownfield sites and should finalise the new local plan in accordance with evolving government guidelines, before Green Belt land is sacrificed. If necessary, location Tr01 should be first be considered as a more appropriate site for development.</p>
<p>20 Grange Road Tring Hertfordshire HP23 5JP</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>50 vicarage road Leighton buzzard LU7 9EY</p>	<p>I STRONGLY object to this proposed development for the following reasons:</p> <p>The development will be built on green belt land which is also adjacent to the AONB. Exceptional circumstances have NOT been</p>

	<p>provided to justify building on this green belt land. Dacorum Borough council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on greenbelt- this review should be allowed to be completed and the new local plan should be finalised before ANY greenbelt is sacrificed.</p> <p>The mere thought that we should sacrifice such an enormous portion of greenbelt land when we are in the middle of a climate emergency is absolutely ridiculous. We, as a countryside market town, should be leading the way in trying to protect this important land. It is completely unacceptable that this proposal should even make it to this stage. Huge new developments such as this one will increase pollution, risk of flooding, loss of wildlife and important habitats and will also change the character of this small, countryside town forever.</p> <p>This land has the protection of the Chilterns Beechwoods SAC (special area of conservation) This provides protection to green belt land near the Ashridge Estate and Tring woodland which the proposal is planning to build houses on. This is unacceptable and this proposal should never have been allowed to get any further for this reason alone.</p> <p>The scale of these plans are completely inappropriate to the current size of Tring. This development plus the Roman park development will increase the population of Tring by 34% which will break the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>The plans claim that there will be additional infrastructure provided by local authorities (Hertfordshire County Council and the NHS) however, there is currently no commitment from these public bodies to do so. I believe that the promises in these plans are all made up by the developer to make the public more willing to accept the plans.</p> <p>I am not against housing growth for Tring, but I believe that it should be more proportionate to the size of Tring and located closer to the main infrastructure. Developments should also not be built on important greenbelt land.</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and response.</p>
<p>3A New Ground Road Aldbury Tring Hertfordshire HP23 5RJ</p>	<p>I strongly object to the proposed development (22/01187/MOA) on green belt land. This is precious land, adjacent to an Area of Outstanding Natural Beauty and recognised as important by its protection by the Chilterns Beechwoods SAC (Special Area of Conservation). Exceptional circumstances have not been provided to justify building on green belt land.</p> <p>Dacorum Borough Council should finish its review of available brownfield sites in urban areas and the new local plan should be finalised before any green belt is sacrificed.</p> <p>The scale of development is totally out of proportion for a town the size of Tring. This development, along with Roman Park, would increase the population of Tring by 34%.</p>

	<p>I am not against any housing growth for Tring. However, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure, in particular the High Street and the A41.</p>
<p>116 Grove Road Tring Hp23 5pa</p>	<p>Dear Sirs,</p> <p>We object to the proposed development on the basis that it is (i) out of proportion with the town, (II) on green belt land and adjacent to areas of AONB / SAC, and (iii) without committed improvements to infrastructure and facilities. Please reconsider.</p>
<p>The White House Northfield Road Tring Hertfordshire HP23 5QW</p>	<p>I wish to register my objection to this application. In my opinion the proposed scheme to build a large 1400 home residential and ancillary mixed use development on the outskirts of Tring is enormously out of keeping with the area.</p> <p>There are several reasons that I believe make this development unsuitable for this location.</p> <p>Firstly, the site is in the Green Belt and most importantly is an area of Green Belt that still retains its rural characteristics. It is also adjacent to the Chilterns AONB and is roughly midpoint between two designated areas of historic Chilterns beechwood, which the Council is looking to protect. The area supports much wildlife which will not see any benefits.</p> <p>Secondly, the proposed size of the development is totally out of scale with the historic market town of Tring. If combined with the ongoing development of Roman Park, this would see an increase of over 30% in the town's population which would permanently distort the characteristics and capacity of the town for ever. It would join the main town to the hamlet of Tring Station and further place further strain on traffic on Station and Bulbourne Roads.</p> <p>In addition with recent world events in Ukraine and current supply and transport issues, it has become clear that food security is a priority. The site is currently grade 2 agricultural land, flat and easily accessible for machinery and should not be lost to agricultural use. In addition the site has historically flooded, thus making it a poor choice for housing, as it will affect any future inhabitants mortgage applications and insurance.</p> <p>The area has a large amount of nocturnal wildlife, including owls, moths and many bats, which would be detrimentally affected by the light pollution that such a development will emit. The area is known by moth enthusiasts, particularly near the Aldbury Nowers as it holds such a diversity of species.</p> <p>If Tring wants to be a sustainable and Green town, developing over and suburbanising green fields and open space is the wrong approach. I am aware that at Tring and Aldbury Council meetings, the feeling has been very much against this particular proposed development. I believe that the local parish council has suggested that alternative brownfield sites could and should be found ahead of any</p>

	<p>proposals to sacrifice green belt land. I would hope that Dacorum Borough Council should finalise their new local plan in accordance with the evolving guidelines.</p> <p>I hope that the Dacorum planning department and officers listen to the local people and reject this application.</p>
<p>The Wolds Station Road Tring Station Tring Hertfordshire HP23 5QU</p>	<p>** Notably, the existing thoroughfare of Station Road reflects the history and provenance of the area separating Tring from Tring Station that will be destroyed by this "ribbon sprawl " development proposal.</p> <p>"The Mall" of the area likes it's name-sake in Central London should be protected and enjoyed as an amenity by future generations.</p> <p>In addition :</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Lynwood Park Road Tring Hertfordshire</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of</p>

<p>HP23 6AT</p>	<p>Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p>
<p>Foxdale Station Road Tring Station Tring Hertfordshire HP23 5QU</p>	<p>This is a green belt area and should be maintained as such, especially at a time where we're faced with unprecedented destruction to our environment.</p> <p>The local road network simply could not cope. Our house is on Station Road, close to Tring train station. A section of the road - from the Iron Room towards the bridge - is single file traffic (except for between 10am-12pm) owing to parked cars, and the volume of traffic at busy times already leads to heavy congestion and frustrated drivers who take matters into their own hands by mounting the kerb intended for pedestrians and cyclists.</p> <p>Do the developers have any evidence that there would be support from local government for the schools / health care facilities they are proposing? As Tring School has only just been renovated, I cannot imagine that any additional funding will be offered up from the government for new schools in Tring. This would mean pupils from Tring would need to travel to Berkhamsted / Hemel Hempstead thus creating more traffic problems. With local resources already stretched, the existing infrastructure of Tring can't support this development without having a severe negative impact on its current population.</p> <p>The building of the quantity of houses suggested, and over the area that has been earmarked, would mean Tring could no longer be</p>

	viewed as a market town, which is has been since 1315. Is seems very unnecessary to build on green belt areas and loose one of the few remaining characterful historic market towns in Hertfordshire.
8 Grange Road Tring Hertfordshire HP23 5JP	<p>This complete scheme is an opportunistic attempt to make profit from a building development which is totally unsuitable and inappropriate to the area.</p> <p>It is being made on the back of an earlier area development plan which is itself flawed and totally discredited with particular reference to the number of properties it proposed for Tring being absolutely disproportionate to developments in other areas. This fact has been established by numerous responses and disproved aspects of the area plan.</p> <p>The so called "Marshcroft Area" is an historic and beautiful part of Tring and is an essential link to the AONB, the ASSI, and the Green Belt.</p> <p>House building on the scale envisaged is unthinkable and will destroy the ambience, atmosphere and very nature of our town and surroundings.</p> <p>The claims of balanced development with appropriate Infrastructure and open areas is blatant nonsense to those who know the area. The concept of such as "affordable housing" is impossible within such an area as Tring unless they are constructed to a totally inadequate standard.</p> <p>This plan must be rejected in its entirety.</p>
5 West Passage Tring Hertfordshire HP23 6AY	<p>I am writing to strongly object to this proposal. The proposed development concerns protected green belt land, which in addition to being very important for the local ecosystem, is also suitable for growing food. As such, it needs protecting in light of growing population and increased need for food supplies. The development proposes 1400 new homes - this is over 50% increase on the current size of the market town of Tring. We do not have the facilities, the infrastructure or the space for all the additional people and cars in this area. This would completely block the high street, and indeed the train station car park would not cope with the supply. The proposal's inclusion of schools and GP surgeries are unrealistic and unfeasible - even if the buildings for them are built, they cannot guarantee that GPs will be establishing new partnerships, or that the council will establish new schools in the area. For these reasons, the proposal is completely inadequate - it would put a significant strain on the community facilities, and would destroy our Area of Natural Beauty so close to both the Asridge estate and the Chilterns. The developers should be looking to redevelop disused brown land in Dacorum, where building new homes would be an improvement, rather than the destruction of the local area.</p>
4 Jubilee Gardens Tring	<p>I strongly object to this application. The whole site is in designated Green Belt and as I understand it, Green Belt can only be released for</p>

<p>Hertfordshire HP23 4JG</p>	<p>development in exceptional & very special circumstances. This is neither.</p> <p>The site is currently cultivated as Grade 2 agricultural land we need to increase our food self-sufficiency, not concrete over farmland! This large number of dwellings will drastically and adversely change the rural setting and character of the market town of Tring and increase traffic with insufficient though or evidence over the supporting infrastructure.</p>
<p>89 Dundale Road Tring Hertfordshire HP23 5BZ</p>	<p>This development shouldn't be granted permission as it will have a detrimental effect on Tring and the surrounding area.</p> <p>The developers promise new schools and doctors but yet they don't ever get built, a prime example of this is Leighton Buzzard where they have built numerous housing estate, the latest one with 4000 homes and there aren't any new schools, doctors or dentists and the roads are gridlocked most of the day. Tring roads weren't built for excessive amounts of traffic.</p> <p>Marshcroft Lane is an idilic place to walk now, it doesn't need a "village" to improve that. Once our green belt land is gone we're never going to get it back and we should be protecting it for future generations.</p>
<p>2 Posting House Tring Station Tring Hertfordshire HP23 5QS</p>	<p>I object to the development on the following grounds:</p> <ol style="list-style-type: none"> 1. Disproportionate to the scale of Tring as existing. It increases the size of Tring by over 30% which is not a sustainable way of developing a small town with limited facilities. 2. Plans put forward by the developer for infrastructure are questionable. The surface water drainage strategy solely relies on infiltration with rather poor rates recorded on site. The proposed attenuation basins are located adjacent to the Grand Union Canal. which is approximately 10m below the development site. Discharge ending up in a controlled watercourse as well as the impact on the structural integrity of the bank has not been considered. Also the half drain times quoted in the calculations are only just below 24 hours which suggests that there is insufficient scope to deliver a surface water solution purely using infiltration. 3. SANG area is not really open area available to the public as this is extensively utilised for drainage features. 4. The road junctions suggested does not offer any improvements to the existing road network to accommodate the increased number of vehicles (approx. 2800) introduced to the area as a result of the development. Proposals to reduce the speed along Station Road is not a means of offering better connectivity or road network to accommodate the development. 5. No clear indication on project programme or how community facilities will be developed. Is the developer funding these facilities? Council should consider carefully how these are integrated to the

	<p>development programme and the budget they do not end up with a large number of housing and land allocated to community facilities but no facilities actually constructed.</p> <p>6. Is the character of the development being questioned by the Council Planners? A development of this scale which is based on a standard house type will alter the character of the whole town in a damaging manner.</p>
<p>1 Grove Leys Grove Road Tring Hertfordshire HP23 5PB</p>	<p>1. As many people are now able to work from home, are these new houses really needed? Why buy an expensive property in Tring, when there are much cheaper homes available elsewhere? There has been a well-documented demographic shift to more affordable rural areas.</p> <p>2. The Government's stated policy of levelling up and developing industry, commerce etc., in the Midlands and North, surely obviates the need for increased housing in this locality.</p> <p>3. This development provides the wrong type of private residential properties. It will simply produce huge profits for the Construction Company and landowners. What Tring really requires to thrive as an inclusive community is more affordable housing for key workers and young people, developed by a Housing Association, shared ownership scheme or otherwise in conjunction with the Council. What provision is being made under Section 106 and its proposed replacement?</p> <p>I have had personal experience of the difficulties in recruiting teachers, who were unable to afford homes in the area.</p> <p>4. It will change the whole character of an historic market town. The sheer size of the proposed development will alter the whole environment from a homogeneous town, centred around the High Street, to an urban area split in two.</p> <p>5. It will be a blot on the landscape in an area of outstanding natural beauty and damage the ecology of the area.</p> <p>6. Marshcroft Lane is an important amenity for the people of Tring - a very popular walk, providing rural peace and charm, and leads to further footpaths along the canal and to Aldbury Nowers. Its value was highlighted during the Covid lockdown, when it proved essential for mental health and wellbeing. Increased traffic along a narrow, one-laned road will render the Lane unusable for walkers.</p> <p>7. Though shops are planned for the proposed development, if these follow the usual pattern of suburban shops, they are likely only to sell daily essentials at a higher price than High Street stores. Therefore, it will increase the pressure on the existing car parks in the High Street, which are barely adequate at present, as new residents will wish to access cafes, restaurants, dentists, doctors, opticians, ironmongers, the weekly market etc.</p> <p>8. Despite the by-pass, traffic in Tring High Street is problematic. Jams are frequent as delivery vans block the road and buses and lorries have difficulty in passing one another. Drivers from this proposed development will inevitably exacerbate the problem.</p> <p>9. If a new secondary and primary school are built, this will increase traffic throughout the town(with its associated problems), as pupils will not be confined to the new development. At the beginning and end of the school day, traffic is considerably increased throughout Tring.</p> <p>10. Building 1,400 dwellings is totally excessive. The new Roman Park development has provided a great number of extra houses in the</p>

	<p>area and many of these are still for sale. The full impact of these on local facilities, in particular, on the station carpark, is yet unknown.</p> <p>11. As there are few executive jobs in the area, the proposed development will be mainly inhabited by commuters, albeit some part-time, as working from home seems to be an increasing pattern. This will alter the sense of community that we enjoy in Tring and turn it into a suburban sprawl. The expansion of Aylesbury eastwards, which is fast approaching the engulfment of Aston Clinton, should alert Dacorum Planning Authorities to the detrimental effects of large developments altering the characteristics of a town.</p> <p>12. Tring simply does not have the facilities or infrastructure to cope with an extra population of what will be at least 3,000 people. The proposed development includes very limited facilities. Additional pressure will be put on doctors, dentists, childcare, station parking and council services (for which the Planning Application makes no provision).</p>
<p>5 Meadow Close Tring Hertfordshire HP23 5BT</p>	<p>I object to planning application (22/01187/MOA) because of the following:</p> <p>1. The Climate Change Emergency is not at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon (ultimately zero carbon) emissions by 2030 and minimising carbon emissions during any construction. Although the Climate Change Emergency is rightly a headline statement in the plan, there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.</p> <p>2. The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have:</p> <ul style="list-style-type: none"> · maximum insulation, · only utilise electrical energy, · must have rooftop solar panels installed at the time of construction, · must be fitted with efficient heating such as air source heat pumps. · All public transport must be electrified. · All construction should be done with sustainable materials or low embodied energy or carbon. · At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. · All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

3. The plan I wish to see should give preference to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.

4. Affordable housing needs is not properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.

5. The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.

6. The plan does not guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.

Thank you in advance for including my submission in the considerations,

The Climate Change Emergency is not at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon (ultimately zero carbon) emissions by 2030 and minimising carbon emissions during any construction. Although the Climate Change Emergency is rightly a headline statement in the plan, there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions.

The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have:

maximum insulation,

only utilise electrical energy,

must have rooftop solar panels installed at the time of construction, must be fitted with efficient heating such as air source heat pumps.

All public transport must be electrified.

All construction should be done with sustainable materials or low embodied energy or carbon.

At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers.

All power must be supplied by electricity or hydrogen generated from sustainable energy sources.

The plan I wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic

	<p>builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods. Affordable housing needs is not properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.</p> <p>The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.</p> <p>The plan does not guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.</p> <p>This is a commuter town and residents rely on transport to make journeys out of the town to travel to work. The present rail and road networks will not sustain such an increase in population.</p>
<p>26 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>To whom it may concern, I am writing to express my objection to planning application 22/01187/MOA.</p> <p>I am not against housing growth in general. I appreciate that we have both a housing shortage, and an affordability problem, and that while there are ways to alleviate both, the only way to ultimately solve them is through more building.</p> <p>However, I strongly believe housing growth needs to be proportionate to the communities it is expanding, be located close to existing infrastructure (in our case, the A41), and on brownfield or infill sites where possible (rather than irreplaceable Green Belt).</p> <p>There are no circumstances here sufficient to justify building on Green Belt land (at least, not until all of the potential brownfield sites have been sufficiently discounted). The scale of the proposal will overwhelm local infrastructure and ruin the character of the historic old town in the process, and the proposed additional infrastructure is insufficient and currently unfunded.</p>
<p>8 Bunyan Close Tring Hertfordshire HP23 5PS</p>	<p>I support the comments of the Grove Fields Residents Association submitted on 3 May.</p>
<p>Beauchamp House 8A Bulbourne Road Tring Hertfordshire HP23 5HF</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p>

	<p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>The Chilterns Conservation Board The Lodge Station Road Chinnor OX39 4HA</p>	<p>Hybrid application (with access details of two main access points from Bulbourne Road and Station road in full and the main development on the rest of the site in outline with all matters reserved) for the demolition of all existing buildings on the site and the development of up to 1,400 dwellings (including up to 140 use class C2 dwellings); a new local centre and sports /community hub, primary school, secondary school, and public open spaces including creation of a suitable alternative natural green space.</p> <p>Land East of Tring - CCB Holding Direction (SAC) Comments (AONB setting)</p> <p>Thank you for consulting the Chilterns Conservation Board (CCB). This application is largely enveloped by the AONB to the northeast, south and southwestern boundaries.</p> <p>SUMMARY POINTS</p> <p>Chilterns Beechwoods SAC (Holding Objection)</p> <p>In our judgment this application requires a strategic assessment of policy. The Local Plan process is the best means, by far, in which to resolve issues of housing need and environmental protection. The Local Plan is paused but not withdrawn and the recent Natural England (14th March 2022) pronouncement on the Chilterns Beechwood SAC is a matter of great importance. We conclude, ultimately, that the long-term protection of the SAC requires an appropriate mitigation strategy to be delivered via the Local Plan process. To attempt such mitigation at application only level must be considered an incremental approach. This cannot be sustainable when applying the appropriate assessment methodology in the Habitat Regulations because it prevents a holistic and cumulative assessment of all sites in preference to a case by case (incremental) approach.</p> <p>The CCB in delivering its duties as established by the CROW Act</p>

section 87 promotes the need for a strategic solution to the protection of the SAC, which the planning authority themselves have been striving to deliver over the last 18 months or so. The 'bespoke mitigation strategy' as promoted by Harrow Estates / Redrow Homes is backed up by a SANGs statement (document 28) and a Habitats Regulation Assessment (HRA) (document 31). 26.88 ha of SANGs (total site area 121 ha) is proposed, in phased delivery and discussions have been held with various parties, including Natural England, albeit they are yet to respond on this application. The key problem is that such an approach is not sustainable for the whole District. The HRA regulations sets the test as a 'significant effect' (either direct or indirect) and this requires cumulative assessment of impact. In our view the LPA would struggle to reach a robust conclusion on such a matter by applying the SANGs methodology in this manner, i.e., on a site-by-site and piecemeal basis.

We raise a holding objection here because the proposed 'bespoke solution' cannot be the way forward for the long-term planning of the District. The NPPF stipulates at its paragraph 15 that, 'The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings'.

The supporting planning statement at 19.3 states that, 'the impact of growth on the Chilterns Beechwoods SAC has been effectively mitigated'. We content that such a bold statement is impossible to prove either way because what is proposed here is, by definition, a piecemeal approach. Looking at the 14th March 2022 Natural England publication on the SAC we cannot envisage that this approach aligns itself correctly with the new mitigation strategy that they are now promoting.

AONB Setting (comments).

The setting of the AONB is a matter of material importance, with the AONB wrapping around the site, to a large extent. A ZVI plan (figure 8.6) shows the nature of intervisibility, and this is required to influence appropriate mitigation. Sensitivity to nighttime light sources (also see figure 8.7) is relevant, to avoid lighting glare and spill into the AONB. Reference to the ILP Environment Zone E1 'natural' and thus the AONB, notes the high sensitivity of this receiving landscape.

The setting of the AONB is a matter relevant to legislation (see CROW Act section 85 for matters, 'so as to affect' the AONB), Development Plan policy (Core Strategy CS24) and in the NPPF (paragraph 176 as revised to include AONB setting in July 2022). The CCB has also produced a position statement on setting and this states (its paragraph 14) that, 'The setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may have an impact even if some considerable distance from the AONB boundary. However, the

distance away from the AONB will be a material factor in forming a decision on any proposals, in that the further away a development is from the AONB boundary the more the impact is likely to be reduced'. Examples can include,:

- Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way;
- Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB;
- Breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and/or movement (viaducts, chimneys, plumes or rotors for example);
- The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways;
- Loss of tranquillity through the introduction of lighting, noise, or traffic movement;
- Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB;
- Change of use of land that is of sufficient scale to cause harm to landscape character;
- Loss of biodiversity, particularly in connection with those habitats or species of importance in the AONB;
- Loss of features of historic interest, particularly if these are contiguous with the AONB;
- Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes.

The AONB Management Plan 2019-2024 also contains a policy on setting as DP4 'In the setting of the AONB, take full account of whether proposals harm the AONB. For example, development of land visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or which increases water abstraction from the chalk aquifer, thereby reducing flow in chalk streams'.

DETAILED POINTS (linked to our comments at the Local Plan consultation stage, Summer 2021).

GB Land as essential Buffer to the AONB and including the SAC.

CCB made the point at the Local Plan stage that the Green Belt acts as a buffer for the AONB and provides a means of managing development within in its setting. Nowhere are the shortcomings in this respect of the draft local plan clearer than in the justification (insofar as it is made in the plan itself) for the release of land from the Green Belt. This is of importance to the CCB because the Green Belt, especially around Tring, Berkhamsted and the north of Hemel Hempstead, fulfils part of its defined purpose of "safeguarding the countryside from encroachment" by providing a permanent and substantial open buffer between built-up areas and the designated AONB, as well as sensitive habitats such as the Chilterns Beechwoods SAC. The Green Belt here also serves as a key means of managing the setting of the AONB as part of protecting its natural beauty and providing space within which that beauty may be enhanced through landscape restoration. Releasing land from the Green Belt in these locations requires rigorous justification, and the "exceptional circumstances" demonstrated surely must, explicitly, take account of issues regarding the setting of the AONB, as well as impacts arising from those developments on the AONB itself, such as visitor management, air quality and light pollution. It is not evident from either the local plan or the "Green Belt and Rural Area" topic

paper that this matter has been considered properly by the council. The supporting text to the Green Belt policy (SP11) at paragraph 19.6 of the draft local plan refers the reader to the "Sustainable Development Strategy" section for the demonstration that "exceptional circumstances" apply to release land from the Green Belt. That section runs to some 28 pages and contains no obvious rationale for Green Belt release.

As applies to this application. The application papers argue very special circumstances for green belt release. This is a matter for the Local Plan process, which allows a valuable opportunity to consider the relationship between AONB protection and setting, including the contribution made by the green belt to that setting.

Transformation / Regeneration of Hemel Hempstead

The main justification for "exceptional circumstances" to release any land from the Green Belt in the local plan appears to be that there is a need for development that cannot be met elsewhere (either within the Borough or in a neighbouring authority). It may be inferred from reading this section (and the topic paper) that the over-riding issue, beyond estimates of need and aspirations for growth (which should, under NPPF para 11(b), be outweighed by the policies that provide a "strong reason" for development restraint), is the sustainable "transformation and regeneration of Hemel Hempstead and renewal of its New Town infrastructure" (para 5.3 of the Local Plan). This is a laudable objective but is hard to see how this necessarily justifies significant releases of Green Belt at Tring or Berkhamsted. This objective may justify the release of Green Belt land around Hemel Hempstead, but not necessarily to determine that the main focus for development should be in the setting of the AONB: preferable alternatives are available.

As applies to this application. Again, and as above the Local Plan process permits an appropriate opportunity for review.

Policy DM31 on the Chiltern Beechwoods SAC

CCB raised an objection to this policy. This was set against an expression of thanks for the engagement undertaken by DBC on the policies and proposals supporting the protection and enhancement of the Chiltern Beechwood SAC sites at Ashridge and Tring Park. Whilst we expressed support for the principle and objectives behind this policy, our objection to this policy raised the point that the focus in much of the plan, including policy DM31, is on mitigating or compensating for the impacts of these developments on the SAC, rather than avoiding the harm arising in the first place

This policy continues to focus on mitigation (with avoidance of harm only considered in terms of the development taking place) and this framework is not considered to provide sufficient protection for the SAC in terms of setting out what evidence is required to justify the assumption that there is need for development sufficient to over-ride the general presumption against causing harm to these sites. There is not even the application of the precautionary principle.

Natural England's subsequent publication on 14th March 2022 regarding the Chilterns Beechwoods SAC takes this point further and adds authority and weight to the need for a strategic approach to any mitigation strategy.

New Natural England advice on Chilterns Beechwoods SAC

The creation on 14 March 2022 of Natural England's Zone of influence (ZOI) of 12.6km around the Chiltern Beechwoods SAC now means that a reappraisal of mitigation is necessary for new residential development, as well as for the Tring Woodlands SSSI. Whilst it may be anticipated that such mitigation will manifest as the creation of SANG's, the development of a strategic approach is necessary amongst the host LPAs and Natural England will require this. The need for this necessary strategic direction and approach makes it 'premature' to determine applications as now proposed for the east of Tring.

Dacorum issued an update on this (via their website) and stated (selected excerpts) that, 'more action is needed to help protect Ashridge Estate on the Hertfordshire-Buckinghamshire border, and Tring Woodlands, which are under increasing visitor pressure from the borough and surrounding areas'. The integrity of the SAC requires a mitigation strategy in fulfilment of the regulatory duties contained in the Habitats Regulations Assessment.

The statement went further to clarify that 'the way we deal with planning applications in the future that involve new homes (and some other types of development) is going to change. Such proposals that are within 500 metres of Ashridge Estate and Tring Woodlands are likely to be refused'.

[it continued]. 'In addition to this, we are legally required not to issue decisions on similar applications elsewhere in the borough until appropriate mitigation is secured. In the interim, this will mean additional checks for affected planning applications and the need for us to put on hold issuing the final decision notice. All other applications will be processed and determined as normal'.

As applies to this application.

This application falls within the spatially defined ZOI. NE's requirement to reinforce an appropriate and long-term mitigation strategy is very timely and will carry weight as a material planning consideration. It gives real force to the argument, itself accepted by DBC, that a strategic approach to mitigation is required.

The Board recommends that the decision-maker takes into account the following:

- The Chilterns AONB Management Plan (<http://www.chilternsaonb.org/conservation-board/management-plan.html>), which deals with the special qualities of the Chilterns and the development chapter notes that 'the attractiveness of the Chilterns' landscape is due to its natural, built and cultural

	<p>environment. It is not a wilderness but countryside adorned by villages, hamlets and scattered buildings'.</p> <p>- The Board is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB</p> <p>The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of CroW Act</p>
<p>2 Okeford Close Tring Hertfordshire HP23 4AJ</p>	<p>I agree with all of the points put forward by the Grove Fields Residents Association in objection to this proposal and would add that any approval for any number of houses should REQUIRE that they ALL incorporate renewable energy generation for heat and power.</p>
<p>Langdale Bulbourne Road Bulbourne Tring Hertfordshire HP23 5QE</p>	<p>Number of main objections to this massive development:</p> <ol style="list-style-type: none"> 1) Development is on designated green belt (and grade 2 agricultural land). Development on this designation defeats the object of the designation and should not be allowed. There are no exceptional circumstances to justify building on Green Belt land. 2) Development is within short distance and in view of designated AONB, again the whole purpose of which is to preserve scenery, wildlife and ecological aspects of the land. The additional number of residents and visitors to those residents will increase the use of that AONB designated land 3) It is close to the Chilterns Beechwood Special Area of Conservation which I believe includes Ashridge Estate. This was massively over used during the pandemic and has suffered as a result. This is now being investigated and the next few years are not the time to add to the footfall in this area with additional residents and their visitors. <p>Other objections centre around Tring:</p> <ol style="list-style-type: none"> 4) This Development is far too large and way out of scale with the town of Tring itself and will completely dominate the town and alter it's character beyond repair. 5) The infrastructure, particularly the roads, surrounding this development cannot deal with the additional traffic and residents that may want to use public transport. There may be a bus stop on Bulbourne Road but there is virtually no service on the route, and the service down Station road is only aimed at the station. 6) The Local Development Plan for Tring is currently under review and no development of any reasonable size should be allowed to go ahead until this Local Plan is complete and approved. <p>Other objections include:</p> <ol style="list-style-type: none"> 7) The Developer claims to have areas for a primary school, secondary school and medical centre and other facilities such as bus routes through the development. It makes it sound like these are a given, but the provision of these are not within their remit and they cannot commit to these. Unless they put forward the funds up front to be ringfenced for these uses, I have no faith they would happen. They should not be allowed to propose them within the development if they are not providing them. They cannot force a bus company to run a route through the development and the bus services for Tring and villages are inadequate for people to commit to using them. 8) The Developer is trying to imply it is being generous in providing recreational areas and a SANG including ponds & waterways, but there is no need for this. This whole area, if left to being Green Belt

	<p>and the adjacent AONB provides this already with many large Reservoirs, canals and nature Reserves.</p> <p>I appreciate we need to build more homes, particularly affordable homes, not large executive homes for people moving out of London to snap up. Tring already has the large Roman Park development that is currently being built and altering the size and character of Tring.</p> <p>There are smaller pockets that may fit better with gradually growing Tring in an organic manner once we know under the new Local Plan what is required of us as a town.</p> <p>This Development of this size should not be allowed to proceed even in a revised format.</p>
<p>Noways Bulbourne Road Bulbourne Tring Hertfordshire HP23 5QE</p>	<p>I object to this application for the following reasons:</p> <p>It is on Green belt land. Dacorum are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on green belt. The review should be completed and the new local plan finalised before any green belt is sacrificed</p> <p>On Grade 1 farming land which is desperately needed to feed everyone</p> <p>Inappropriate to the size of Tring and the Infrastructure could not cope with this increase</p> <p>Adjacent to the Area of Outstanding Natural Beauty and which has the protection of Chiltern Beechwood's SAC</p>
<p>Highway Upper Icknield Way Bulbourne Tring Hertfordshire HP23 5QF</p>	<p>This proposed development is another massive development within Tring which is within an AONB.</p> <p>Ecologically, it will destroy more farmland and hedge and field margins thus having a negative impact on the biodiversity of the Chilterns.</p> <p>It will again increase the size of Tring and put increased pressure on the land at Tring Park (Woodland Trust) and Ashridge (National Trust). Both areas are within walking distance and are already suffering from a massive increase in footfall which is damaging the environment. Woodland Trust have already stopped Parkrun from taking place in Tring Park due to concerns about this.</p> <p>The development will substantially alter the size and nature of Tring as a market town and Bulbourne as a hamlet. Bulbourne itself with its rural and canal associations will be swallowed up by Tring.</p> <p>I note that the development proposes a new school. There are insufficient dwellings for a whole new school. Thus students will potentially be brought in from the surrounding areas including out of county to the school, increasing the traffic still further. The existing community facilities and road system will be unable to cope with the increase in demand with a development of this size.</p>
<p>9 Myrtle Cottages Bulbourne Road Bulbourne Tring Hertfordshire</p>	<p>I object because it proposes:</p> <ol style="list-style-type: none"> To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability

<p>HP23 5QE</p>	<p>of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>Woodlands Bulbourne Road Bulbourne Tring Hertfordshire HP23 5QE</p>	<p>We object to the planning application relating to farmland in the East of Tring, Marshcroft area (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which is Grade 2 Agricultural land.</p> <p>3. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>4. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>5. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>6. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to</p>

	<p>walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>7. As residents of Bulbourne we are concerned at the additional traffic that would be using both Bulbourne Road and Station Road if this development were to be approved. The canal and railway bridges at Bulbourne already create traffic jams, creating noise and pollution in an otherwise rural location. The road is not suitable for any additional traffic.</p> <p>8. We regularly walk the footpaths adjacent to this proposed development and know the diversity and rarity of plant and animal life its habitat currently provides. It is important to the ecology of Tring that its countryside is preserved and maintained rather than destroyed.</p> <p>We are not against housing growth for Tring. However, we believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should have been provided for the public to review, digest and respond.</p> <p>We sincerely hope that the planning committee will reject this and any other proposals for development of this land.</p>
<p>Jubilee Cottage Bulbourne Road Bulbourne Tring Hertfordshire HP23 5QE</p>	<p>I strongly object to the planning application (22/01187/MOA) for the following reasons:</p> <p>The definition of Consultation is technically any activity that gives local people a voice and an opportunity to influence important decisions. It involves listening to and learning from local people before decisions are made or priorities are set.</p> <p>Under the Countryside and Rights of Way Act 2000, the relevant local authority, must make sure that all decisions have regard for the purpose of conserving and enhancing the natural beauty of the AONB. Decisions and activities must consider the potential effect it will have within the AONB and land outside its boundary.</p> <p>With the above in mind my main objections to this proposed development are due to the impact of the quality of life for our community and these include:</p> <ul style="list-style-type: none"> - The visual impact and harm that may be caused to the Area of Outstanding Natural Beauty and the surrounding areas. - The proposed development would potentially affect drainage, soil stability, wildlife habitat, atmosphere and appearance of the area. - Increased noise and traffic as a result of the proposed development could affect living conditions and our quality of life will undoubtedly be compromised. - The stress on an already limited infrastructure which includes utilities, road thoroughfare, parking and availability of school places. - The impact on the road (B488) and the additional load on the canal bridge. It is estimated that currently in excess of 14,000 vehicles already pass through Bulbourne in a 24 hour period. Within 300 yards

	<p>through Bulbourne there are at least 6 access points to the already overstretched B488 particularly during busy times.</p> <ul style="list-style-type: none"> - The hamlet of Bulbourne already has a canal bridge with narrow priority access which is frequently disregarded as well as multiple access points i.e., Garden Centre, allotment car parking, the Close, Grand Junction Public House, Canal roadway and the new Bulbourne Yard, therefore I am extremely concerned that the proposed development will exacerbate an already overused and dangerous stretch of highway with no effective traffic calming measures leading to the potential of serious injury or death. - I believe that the impact this proposed development will have on the environment of our Area of Outstanding Natural Beauty - its landscape, biodiversity, amenity, access and natural resources - have not been adequately considered, assessed or addressed within the consultation documentation/design documentation.
<p>1 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>We object to this development for the following reasons.</p> <p>It would have a devastating impact on biodiversity in an area of green belt which currently has ancient hedgerows and woodland on it. The green belt should be maintained, and brownfield sites in the borough developed and converted instead.</p> <p>Parts of this land has flooded in the past and as a result would appear to be unsuitable for residential buildings.</p> <p>This scale of development is excessive and is not needed in Tring. It would unnecessarily and irreversibly change the character of this small, historic market town. Amenities and road capacity are already limited and the locality would not be able to support the increased population or related vehicles.</p> <p>Tring Station is a small hamlet and this development would change it completely, and see it absorbed into a suburban sprawl.</p> <p>Employment opportunities are very limited in this area so people would need to travel to work - public transport is not sufficient so more people would use cars which is not good for the environment.</p> <p>The infrastructure is not designed to accommodate such a large increase in population - for example there aren't enough doctors, leisure facilities and childcare providers.</p> <p>This development is excessive and inappropriate for this location.</p>
<p>19 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>We strongly and wholeheartedly OBJECT to this proposal because it proposes:</p> <ul style="list-style-type: none"> - To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Brownfield sites should always be prioritised in the first instance. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. - To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.

	<ul style="list-style-type: none"> - To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. - Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. - Put simply, green spaces like these are vital for the wellbeing of local residents and wildlife. - On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.
<p>9 Barbers Walk Tring Hertfordshire HP23 4DB</p>	<p>I would like to raise my objection to the Tring planning application (22/01187/MOA).</p> <ol style="list-style-type: none"> 1. The proposed development would be on Green Belt which should be only used where exceptional circumstances apply. There are no exceptional circumstances demonstrated in the proposal. The notion of a 'Hybrid' application suggests that future plans may change with possibly increased impact. 2. This application would result in a massive negative impact on Tring town centre and links out to the A41. Increased noise, pollution and congestion during development and the subsequent impact of increased traffic post development, plus increased light pollution from 1400+ houses and associated infrastructure. 3. Significant housing development has already taken and is taking place in Tring which is proportionate to the locality and fabric of a small market town. 4. In light of the current Climate Change Emergency, any large scale development will incur massive carbon emissions, caused by building materials, transportation, power consumption from machinery and operational usage. The development could already be in carbon deficit before any 'claimed' reductions from can be applied.
<p>13 Drummond Ride Tring Hertfordshire HP23 5DE</p>	<p>This application sits within the Chiltern Beechwoods SAC entirely within Designated Greenbelt and Grade 2 quality agricultural land abutting an ANOB and is a totally unacceptable change of use. The application states that it is moving Tring closer to the Railway Station. As a 35 year resident of Tring (10 years at Tring Station and 25 years in Tring) I have never heard anyone ask for houses to be built on the fields between Tring, Bulbourne & Pendley. A</p>

	<p>development of this size and location will fundamentally alter Tring and not for the better.</p> <p>If you accept that there is a need to sacrifice greenbelt land for investment in social infrastructure then there is a preferential site already identified in the Draft Local Plan TR01 Dunsley Farm. This is more local to the Town Centre and A41 junction and is listed as an opportunity for mixed use development (housing, industrial, primary school and supermarket).</p> <p>Please do not accept this Hybrid Application. It offers land for schools which are not funded which can be designed out at a later date if they decide it is not viable. A current example of this is over the border at Pitstone Bucks where a developer has stepped back from a commitment to install a pub & nursery on the Castlemead development and has submitted an application to replace these with additional housing.</p> <p>This developer has offered a SANG as an alternative to Ashridge. In reality it is on land that the developer is not allowed to build upon or change any ground levels (refer to comments by pipeline consultation). The SANG car park will be used by train commuters. It is not a real alternative.</p> <p>There are many other detail points that are wrong on highways and school catchment for example but the fundamental issue is that this is prime greenbelt and high quality agricultural land abutting an ANOB. This should never be permitted for housing</p>
<p>Long Barn Chapel Lane Long Marston Tring Hertfordshire HP23 4QT</p>	<p>Object due to lack of amenities such as doctors surgery's, hospitals and dentists in the area. All of these are already full to capacity. Tring is a small market town and cannot cope with another 1,400 dwellings as it does not have the jobs to support an increase in population. It also cannot cope with the traffic pollution. I strongly object to this proposal as it will ruin Tring.</p>
<p>Saddlers Cottage White House Gardens Tring Hertfordshire HP23 6FA</p>	<p>To whom it may concern</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no</p>

	commitment from these public bodies to do so.
8 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL	Too much of a development- takes away the "market town" character that Tring brings. Adds too much pressure on doctors surgery who are already under immense pressure. Increased traffic on the country roads will only cause more accidents and lead to the high street being clogged up which adds danger too all resident of tring.
Martins Station Road Tring Station Tring Hertfordshire HP23 5QX	<p>I object to the proposal on the following grounds:</p> <p>1 Permission to build on Green Belt land, which is also adjacent to the Chilterns Area of Outstanding Natural Beauty, should be refused. No "Very Special Circumstances" have been put forward to justify the damage to the Green Belt. The land is also much needed grade 2 agricultural land.</p> <p>2 Development is not permitted in view of the Chilterns Beechwoods SAC Development Restrictions. The offer to provide a suitable alternative natural green space is not an adequate mitigation.</p> <p>3 It is not acceptable to build on a scale that is inappropriate to the current size of Tring. This proposed development, plus Roman Park, would increase the population of Tring by 34%, which would overwhelm the capacity of this historic market town forever. The proposed development would also have a serious impact the hamlet of Tring Station. Difficulties of access to, and parking at, the railway station itself would be exacerbated.</p> <p>4 There is no commitment from principal authorities and the NHS to fund additional infrastructure, e.g. new schools and health centres.</p> <p>5 Dacorum Borough Council should be seeking alternative brownfield sites and should finalise the new local plan in accordance with evolving government guidelines, before Green Belt land is sacrificed. If necessary, location Tr01 should be first be considered is a more appropriate site for development.</p>
3 Pendley Bridge Cottages Station Road Tring Station Tring Hertfordshire HP23 5QU	<p>Dear Sirs, I am a resident of Tring Station and wish to strongly object to the above application for 1400 houses on land between Tring and Tring Station on the following grounds.</p> <p>The land on which this is proposed is all Green Belt and adjacent to an AONB.</p> <p>The size of the development is wholly inappropriate and would totally change the nature of Tring from a pleasant market town to a conurbation, and would put damaging pressure on already stretched local facilities.</p> <p>The need for such a condensed and large scale development has not been proven, especially post Covid, in the light of people's changing work patterns and the rise in home working. This is likely to result in much more office and retail space in towns becoming available for conversion to domestic use.</p> <p>The developer is being opportunistic in trying to push this through in the light of the local authority's pause and re-think of local planning</p>

	<p>policy. Any development should be on a smaller scale and spread over many sites to prevent an irreversible change in the nature of Tring.</p>
<p>1 Pendley Bridge Cottages Station Road Tring Station Tring Hertfordshire HP23 5QU</p>	<p>Greenbelt land should only be used in exceptional circumstances, which is not proven in this case. All brown field possibilities should be found and used instead. We should be protecting our green areas to encourage wild life, to produce food locally and to enhance well-being for the existing community.</p> <p>Tring is too small and congested to support such an increase in population. Tring High Street is already dangerous as the pavements are so narrow that passing bus wing mirrors could easily hit pedestrians. The existing services and infra structure will not support such an increase and the historic character of the town and neighbourhood would be completely transformed, from a small rural market town to a sub-urban sprawl.</p> <p>I, object to the planning application (22/01187/MOA) because it proposes:</p> <ul style="list-style-type: none"> o To build on an area which includes many hedgerows which house a rich variety of birdlife (most notably the Yellowhammer- a species which is currently on the British Trust for Ornithology 'Red List' - birds whose decreasing abundance renders them of great national concern.) The UK has lost some 600 million birds since 1980. I object most strongly to Dacorum adding in any way to this disastrous loss. o To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. o To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. o To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. o Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. o To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to

	<p>walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment</p> <p>It is totally understandable to me that housing needs to be considered, however, the proposed site of planning application 22/01187/MOA is in my opinion thoroughly misguided in so many ways.</p>
<p>Buckeye Barn Station Road Tring Station Tring Hertfordshire HP23 5QU</p>	<p>This land is agricultural green belt land which must be protected, particularly given it's adjacency to AONB. It's easy to see that once green belt is built upon, AONB isn't seen in the same way and won't look quite as appealing surrounded by concrete. Once green belt land is gone, it isn't coming back.</p> <p>The Chiltern Hills are to be protected for future generations and the view from, in them and around them cannot be destroyed in this way. Building on ancient land such as this with hedgerows bursting with insects and wildlife is damaging to our planet; change for the better needs to begin in our local neighbourhoods and we need to protect this land and hedgerows.</p> <p>Currently the Ashridge Estate & Chiltern Beechwood area has a protection order which extends 500m around it's perimeter on it whilst the findings of how much the recent increase in visitors has had on it. The Marshcroft site is 1.5 miles from this area and it is unthinkable that 1400 homes plus could be proposed on this site.</p> <p>It looks like a main access point to the proposed development is on Station Road, close to Cow Lane. Cow Lane and Station Road, especially next to the Station area cannot take more traffic; they are already busy and cause issues with cars parked on pavements (Cow Lane) or driving up pavements to get past cyclists and pedestrians (Station Road) where is the space to expand these roads? Marshcroft Lane is tiny and leads onto Grove Road and it's busy school activity - I am really unsure how this can possibly work for access to so many new homes?</p> <p>The vision of the centre of the town of Tring needs to be clearly expressed as part of this development as it is already congested. The new proposal may state now that there will be shops etc built into the proposal but we've all seen developers work and what is planned initially is VERY different to what is built finally. For this reason it's important for all town residents to understand how the infrastructure of Tring overall will change to accommodate an additional area that looks to be about a sixth of the size of the current town.</p> <p>The initial proposal calls out the building of dog walking routes, cycle routes, rambling routes and water side routes...these aren't selling points, these already exists naturally - the building of these is unnecessary and a waste of resources, which given the current state of the world, is irresponsible.</p>

	<p>A small but significant point I'd like to make is that there wouldn't be a need for an allotment (as shown on the master plan,) if the housing plan that we have yet to see was truly rural...the fact that an allotment has been mentioned is concerning.</p> <p>The fields that run parallel to Station Road are often flooded - it's very wet and damp - is this a flood plain??</p> <p>Tring School has been run down and needing much improvement for years; it's currently being rebuilt after gaining much needed funding - yet now we see plans for a spanking new school or 2 if we can also have 1400 homes in the same area - this is somewhat sickening to read and whilst not directly linked to those proposing this scheme, shows the motivation of greed of those who govern over these areas. On top of this, I don't believe a developer can state that a school will be built on the development so this is somewhat misleading.</p> <p>Light pollution also needs to be considered. Why should rural communities who chose to live a little more remotely have street lights forced upon them? How will the inevitable light pollution impact the local wildlife?</p> <p>To summarise, we don't need houses, street lights, roads, manmade paths, walks, routes etc on this rural side of Tring. This is the Chiltern Hills bordering AONB; we need to maintain it in all it's natural beauty for future generations to enjoy.</p>
<p>Ashdown Station Road Tring Station Tring Hertfordshire HP23 5QU</p>	<p>The use of greenbelt land adjacent to an Area of Outstanding Natural Beauty should not be approved. It is incredible that it is even being considered. Brownfield sites should be prioritised for any such development.</p> <p>There are numerous infrastructure challenges with this proposal, with notably the road infrastructure being woefully inadequate for the number of houses proposed. Most households appear to have at least 2 cars, which at 1400 houses makes an additional 2800 cars trying to use the small roads of Tring, not to mention the increase in carbon arising. The infrastructure at Tring Railway Station is also inadequate to support a development of this size and it is extremely surprising to see that none is identified as being required. Naturally it is therefore entirely feasible that further development of the station will be required in due course (car parking, station facilities etc) and as this area is wholly within the Area of Outstanding Natural Beauty, should be taken into account now. Problematical parking within Tring Station and along Beggars Lane (all within the AONB) can be expected to increase. It is exceptionally naïve for the developer to place any reliance on people walking, cycling or using the bus to get to the station. As soon as the nights draw in, or the weather becomes inclement, residents will reach for their car keys and we will have chaos at Tring Station when the car park becomes full. The proposed site will also adversely affect the bio-diversity of the area which is a natural habitat for foxes, badgers and red kites to name just a few.</p> <p>The hamlet of Tring Station will be permanently and irrevocably damaged by this development with the increased traffic travelling</p>

	<p>between Tring and Tring Station making it impossible to cross the road or allow our children to play out the front. The unique identity of Tring Station, which is alive today, will be consigned to the history books. We will go from a proper functioning community to simply a main road with houses on either side and increased emissions, with all the side effects that brings.</p>
<p>Pendley Manor Lodge Station Road Tring Hertfordshire HP23 5QY</p>	<p>Having lived in the tring area for over 35 years I am writing to object in the strongest possible terms to the above planning application. I note that it would increase the size of Tring's housing by 34% which would not only change but damage a relatively small market town that historically has had a rural feel.</p> <p>The intention to allow an access point on to station road would vastly increase traffic on to an already fast and extremely busy road which is tantamount to endangering life. This would especially impact the cyclists who choose not to use the cycle path as it is poorly maintained.</p> <p>The added noise and roar of that traffic would be a constant irritation and unwelcome disturbance.</p> <p>The existing infrastructure would be sorely tested and as yet there is no guarantee that the required schools, surgeries and shops would be built.</p> <p>To build on green belt is borderline criminal as there are available brown belt areas that are far more sensible in terms of access to Tring's amenities. This is a complete failure to adhere to green belt policy.</p> <p>I hope you do take my and the other residents of Tring's objections into account and throw this appalling plan out.</p>
<p>Hilldale Cow Lane Tring Hertfordshire HP23 5NS</p>	<p>I write to object to planning application number 22/01187/MOA, in respect of the noise and disturbance resulting from use. Design and Access Statement. Part Three Demonstrating Compliance.</p> <p>This document fails to demonstrate compliance with the National Design Guidance and National Model Design Code (NMDC) or with the recommendations of the 'Building Better, Building Beautiful Commission'. With respect to noise and disturbance from Transport and Accessibility and Traffic and Transport amongst other matters.</p> <p>Transport and accessibility (Disturbance resulting from use) 11 Transport Assessment - Part 1. Appendix A of this document refers to the HCC scoping Correspondence which includes the 'Transport Assessment and Modelling Scoping Report'. Paragraph 2.5 states that " a review of the local highway network will be undertaken. This will include a detailed review of Station Road, Bulbourne Road, Marshcroft Lane and Grove Lane." No mention is made of Cow Lane along which the vast majority of the traffic generated by the proposed development will pass. The effect on this main transport artery has not been considered.</p> <p>In addition, on Cow Lane is the Dorian Williams Sports Ground, used by 100's of people every week attending the numerous sports clubs on the site; not least the Tring Rugby Club, one of the premier clubs in Hertfordshire.</p> <p>Elsewhere in the planning application it is mentioned that the development has been designed to connect with the existing town facilities and transport infrastructure. The design does not include for</p>

the connection to the principal sports facility in the Tring District, with no cycleway or footway proposed. On the contrary it has been completely ignored.

The report acknowledges that the junctions at either end of Cow Lane will not be able to cope with the envisaged traffic volumes and will need mitigation measures to be put in place if congestion is to be avoided. The impact on the lives of the residents of Cow Lane and the users of the sports facility has not been addressed.

The traffic study is based on data gathered in 2021 factored by 10% to acknowledge the impact of the Covid lock down on traffic flows.

This factor is woefully inadequate. The traffic flows on Cow Lane and queuing at each end of Cow Lane is far in excess of that contemplated by the data modelling. Clearly no one had actually been to Cow Lane in the morning and afternoon peak periods - pre-pandemic - to witness the queuing. As a resident of Cow Lane, based on the data provided, be assured that the scheme is not designed to reflect reality.

6 Environmental Statement

10 Traffic and Transport. (Disturbance resulting from use and Noise)

10.4 Methodology. The IEMA Guidelines states that 'people at home, people in work places, people walking, people cycling ' should be considered. The only sensitive receptor considered on Cow Lane (link 13) was the Rugby Club. Table 10.6. The report fails to address the effect of an +81% increase in traffic volumes will have on the lives of the residents. The effect of an increase of circa six thousand vehicles a day passing within 5m of my house has not been addressed. No attempt has been made to mitigate the environmental impact on the residents of Cow Lane. The statement in paragraph 10.7.24 that a 81% increase in traffic flow will have a " Minor adverse effect to both pedestrian delay and amenity along this link based on professional judgement and experience." The amenity value of Cow Lane will be massively affected by this development. Suggesting the development will have a minor adverse effect; is ludicrous at best.

In addition, the section 10.7.11 only considers the effect of construction traffic on the Site, no consideration is given in any part of the document to the blight 10 years of construction traffic will have on the lives of the local residents.

The statements within paragraph 10.9.2 and 10.9.3 that the construction and operational phases of the proposed development will have a negligible effect on all highway links is unbelievable and once again does not reflect reality. No strategic thinking or material enhancements are proposed to the existing highway infrastructure for this development that will increase the size of Tring by over 30%. The report only considers two committed developments and does not acknowledge future proposed housing development adjacent to Marshcroft on Grove Road or the development of the Cow Lane Farm/ Dunsley Farm site. Both of these two sites will further significantly increase the traffic on Cow Lane. The Summary 10.12 is not a fair reflection of the effect of this development.

12 Noise and Vibration. (Noise resulting from use)

Within this section of the report background noise has been measured at various locations on the site. However, once again Cow Lane which is the most affected of all roads is not included within the study area. However it is acknowledged in Table 12.7 that the link road that is

	<p>most affected is Cow Lane. The change in noise level is as assessed a 2.5 (dB) described in table 12.5 as 'very low but potentially perceptible increase'. The affect of an additional circa six thousand vehicles passing my house is not minor. The increase is +81% in traffic volume. The efficacy of these data is challenged.</p> <p>Finally, the period offered by the Council to comment on this planning application is wholly inadequate. This is a significant development which will change the character of the town for ever and affect the lives of 1000's of people. The circa two weeks offered does not allow time to digest the content of the planning application and provide a full and considered response.</p>
<p>Oddy Fields Cow Lane Tring Hertfordshire HP23 5NS</p>	<p>My husband and I object to this planning application (22/01187/MOA) because it proposes;</p> <ol style="list-style-type: none"> 1. The green belt should be protected. Circumstances have not been provided to justify building on it. And the new local plan should be finalised before any green belt is sacrificed. 2.To built on the scale that is inappropriate to the size of Tring. Our infrastructure which is already under stress would be broken. With the all ready new builds in the town population it would increase by 34% and change this market town forever. 3.We have no commitment from either the developer or HCC or DBC for new infrastructure funds. Funds are scarce and a promise of an outline is not enough. 4 . Our environment and health go hand in hand. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.
<p>Jasmine Cow Lane Tring Hertfordshire HP23 5NS</p>	<p>This is an Area of Outstanding Natural Beauty which should be protected. The development will result in significant harm to the environment, be a visual intrusion and put significant strain on already overloaded public services. It will also have a significant impact on the local road and infrastructure networks causing bottlenecks and traffic problems.</p>
<p>The Cedars 68 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I object to the planning application 22/01187/MOA because:</p> <ol style="list-style-type: none"> 1. It is a hybrid application and one which I urge Dacorum Borough Council to use their discretion not to accept. 2. The Developer (Harrow Estates/ Redrow) only owns part of the site (that nearest to Station Road) so there is no commitment that the site would be developed as is outlined in this application. 3. The timeframe of development of over 11 years (2022-33) is very long and will mean adverse impacts of construction, loss of amenity,

increased demand on local resources for a very considerable time and without obligation for the developer to provide infrastructure, and other associated adverse effects including parking in the town centre..

4. Community infrastructure such as new schools, health centres, and I believe a larger building for Tring station and perhaps increased car parking at the station too will all be needed. The developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution'.

5. The whole site is designated green belt and such land can only be released for development in exceptional and very special circumstances. I understand that these proposals fail to demonstrate exceptional circumstances (see national Planning Policy Framework revised 20.7.21 in particular paragraphs 147-9).

6. As pointed out in the Report to Inform a Habitats Regulations Assessment (at 3.2.3.) Under the Conservation of Habitats and Species Regulations 2017 (as amended) Competent Authorities have a duty to ensure that all the activities they regulate have no adverse effect on the integrity of the Natura 2000 sites e.g. Special Areas of Conservation (SACs).

7. The site is close to nine conservation sites (these being listed in Table 1, paragraph 1.4 of the above Report). including an SAC, Sites of Special Scientific Interest (SSSIs), Local Wildlife Sites (LWSs) and an Ancient Wood (LW). Traffic from the proposed Development is predicted to increase on roads near to four of these namely:

Ashridge Commons and Woods SSSI/ Chiltern Beechwoods SAC,
No-Man's Friend Wood AW
College Lake (91HO2) LWS
Pitstone Fen (91HO1) LWS

There is a potential impact on air quality therefore relating to road traffic emissions of oxides of nitrogen (NOx) and ammonia (NH3), and their subsequent impacts on NOx and NH3 concentrations, and on nitrogen and acid deposition fluxes.

College Lake and Pitstone Fen are separated by a railway and the bridge over this section of line is narrow and controlled by traffic lights. Emissions would be particularly high here with traffic decelerating and then accelerating on both sides of the bridge.

8. Apart from emissions the extent of housing envisaged for the development will generate an enormous additional human pressure on those conservation sites open to the public which of course includes the Chiltern Beechwoods SAC

9. 'Limited potential sources of contamination have been identified on or near the site, however, on-site fuel tanks and the presence of vulnerable aquifers beneath the site represent potential environmental risks' (see document 'Phase 1 Geo-Environmental Assessment Report Part 1')

	<p>10. The proposed road across Marshcroft Lane will completely spoil the enjoyment of so many who currently walk from Grove Road to Marshcroft Bridge and beyond. This intersection of Marshcroft Road should not be permitted.</p> <p>11. While I am not against housing growth for Tring, I believe it should be more proportionate to the size of Tring.</p> <p>12. While I have looked at several of the planning documents it has been impossible in the time available to review all of them. A longer period than the 4th May should be given for the public to respond.</p>
<p>Greenways 88 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>Dear Sir/Madam,</p> <p>I live in Grove Road, Tring and have done so for the last 47 years. The reason we stay here has much to do with the character of Tring - a town that has managed to stay within its boundaries rather than becoming part of the urban sprawl that threatens to despoil our area of outstanding natural beauty. The Green Belt land and the Ashridge Estate are irreplaceable resources. I object to this application which seems very ill-thought-through for the following reasons:</p> <p>It proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the</p>

	<p>public to review, digest and respond . I trust you will consider these comments and come to a wise decision.</p>
<p>3 The Grove Marshcroft Lane Tring Hertfordshire HP23 5PN</p>	<p>Dear Sir/Madam,</p> <ol style="list-style-type: none"> 1. The proposed development of up to 1,400 dwellings would change Tring from a small rural Town to a more suburban sprawl. 2. Where are the residents expected to work? 3 Pre pandemic it was difficult to park at Tring Station all the other parking in the area of Tring Station is resident parking only. 4 The bus service, 500, to Watford and Aylesbury is not that regular. The B1 service to Dunstable is very few and far between. They all stop early evening 5 I think this proposed development is too large for Tring
<p>Highgrove House 122 Grove Road Tring Hertfordshire HP23 5PA</p>	<p>Please see below my family objection to the proposed development and we support all the reasons raised by the GFRA. "I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Beauport</p>	<p>OBJECTION TO PLANNING APPLICATION 22/01187/MOA</p>

<p>74 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>My reasons are as follows:</p> <ol style="list-style-type: none"> 1. The proposed site is adjacent to an Area of Outstanding Natural Beauty and the scale of this development will no doubt have a deleterious effect. In particular I understand Ashridge is currently under review to assess the impact from an influx of visitors. 2. This is good agricultural land which is cropped annually and in view of increasing food security issues impacting the UK it makes no sense to build on this site. 3. The population of Tring is approximately 12,000. The proposed development of 1,400 houses will likely increase the population by 4-5,000. This is a wholly disproportionate increase in population which will severely impact the infrastructure and character of this small market town. 4. The town's infrastructure of, for example, medical services is already stretched and when I attended the open day at the end of 2021 no assurance could be given by the planning consultants that further resources would be provided for the increased population. 5. Whilst I am sure there are planning assumptions, realistically 1,400 houses will give rise to some 2-3,000 extra cars. These vehicles will use Station Road and Bulbourne Road. In my view these roads are inadequate to take this extra volume and in the case of the Bulbourne Road there are the pinch points of roadside parking, the one lane bridge over the canal and railway line. 6. If planning consent is granted for this development will the owner of the land behind New Mill/Bulbourne Road seek planning approval for building houses on this adjacent land? If so, will a precedent have been set with the consequence of even further development which will destroy the character of this small market town. 7. The planning application states building work will take place over a protracted period. How is this consistent with the probable constant disturbance to the residents of the town and impact on their mental health? 8. I note there will be a strip of allotments abutting the rear gardens of the properties in Grove Road. Who will own these allotments, how will they be accessed and are they potential "ransom strips" for further infill development at some later stage?
<p>Abbotsford 114 Grove Road Tring Hertfordshire HP23 5PA</p>	<p>I am not against housing growth in Tring, as long as it is in proportion to the size of the town, and is located on the adequate brownfield sites which are closer to the town and the main infrastructure (town centre and A41) thus reducing traffic needs.</p> <p>The time allotted to allow the public to consider and comment on this proposal is inadequate, given the weight of the documentation which needs to be examined, and more time should be made available to consider its contents.</p>

However I wish to object to the planned development on the following grounds:

1. It preempts the process by Dacorum Borough Council of creating a plan for the future development of Tring. At present the appropriate level of housing development is unclear, and no exceptional circumstances have been provided to justify such a large development (1400 Houses). Dacorum Borough Council are reviewing available brownfield sites to minimise Green Belt use. The New Local Plan should be finalised before planning permission is given to develop Green Belt land. There are several sites closer to the town each able to provide, like Roman Park, several hundred dwellings. There is no need to build on this Green Belt land adjacent to an Area of Outstanding Natural Beauty.

2. This Green Belt land near the Ashridge Estate and Tring woodlands is protected by the Chiltern Beechwoods SAC (Special Area of Conservation) from the proposed plans to build what amounts to a new town of houses with no underlying infrastructure.

3. This is good agricultural land, which in today's climate of political uncertainty should be preserved for this purpose.

4. This proposal is on an inappropriate scale to the current town of Tring, and is inappropriate for its town centre facilities, where development is extremely constrained. Together with Roman Park on the western fringe, it would increase the population by 34%. Further projected developments within the current boundaries will increase the population to well over 50%. There is no suggestion anywhere that Tring is a New Town, justifying such expansion. This proposal will alter the character of this ancient historical town for ever, causing the loss of ambience which makes it special.

5. The local infrastructure is already under considerable strain. The additional infrastructure required to increase the population by half for schools, health centres, roads, water, sewage etc. has to be provided, not by developers such as Harrow Estates, who contribute nothing other than space, but by the Local Authorities (Hertfordshire County Council, Dacorum Borough Council and the NHS). There is no commitment to provide any of these currently. A new senior school has just opened, which cannot provide for the demand which would arise if these plans were accepted. Health provision is under immense strain and is already failing the population of Tring.

6. Building east of Tring will involve heavy traffic movement. It will add at least 2500 private vehicles alone to the roads. Claims of massive bicycle use and walking, based on present evidence around a smaller area, are preposterous. In winter and bad weather only a handful of people travel to shops and station by these means. There is a more suitable location (TR01) closer to the A41 from which people can walk to the town centre. TR01 provides sufficient space for a proportionate development of Tring's housing supply, in a location which minimises the impact on the environment.

<p>Radlett 108 Grove Road Tring Hertfordshire HP23 5PA</p>	<p>This seems to be a planning application designed to exploit Dacorum's current lack of an agreed long term development plan rather than provide something that the community needs. It should be rejected because:</p> <ol style="list-style-type: none"> 1 It is on green belt land in an area of outstanding natural beauty. 2 Tring's infrastructure cannot cope with an influx of 6000+ people without significant investment. The developers don't address this issue. 3 The road network surrounding the proposed development cannot cope with an additional 1400+ cars without new bridges over the canal and railway. 4 The development is too far from the centre of Tring to be able to get there without the use of a car. There are no facilities in Tring to cope with such increased traffic and no room to create them. <p>In summary a development of this scale must be integrated with an agreed public plan as otherwise the developers won't pay a fair share towards the development of appropriate infrastructure on what would be a £1 billion development and an increase the size of Tring of circa 33%.</p>
<p>Greenpoint 102 Grove Road Tring Hertfordshire HP23 5PA</p>	<p>Simply no - please don't do this. Building on this land that has long been protected as green belt land that will fundamentally change the character of Tring and isn't required here.</p>
<p>The Clock Cottage 82 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>This Planning Application must be for one of the largest ever development proposals for the expansion of Tring. If it were to be approved, it has considerable implications not only for Tring but also the wider communities in Dacorum, Hertfordshire and Buckinghamshire. It would dramatically change Tring's setting immediately adjacent to the Chilterns AONB.</p> <p>The proposal is clearly contrary to the current Development Plan in that the proposal falls within the designated Green Belt. We OBJECT to this application.</p> <p>The designation of Green Belt has been a long established policy and this, coupled with the adjacent Chilterns Area of Outstanding Natural Beauty has successfully preserved a sensible balance between urban and rural uses. If this application were to be permitted, the urban area of Tring would increase substantially, thus changing the urban / rural balance with nearby communities. This would be most detrimental to the character of this part of the Chilterns. There cannot be any justifiable reason to override the established Green Belt policy.</p>
<p>2 Fog Cottages Tring Station Tring Hertfordshire HP23 5QP</p>	<p>I strongly object to development of green belt land. Green belt land was created to protect the environment and communities from unwanted and unnecessary urban development. The land in question is also Grade 2 agricultural land, which is needed and will continue to be needed for food production. The current situation in Ukraine will lead to grain shortages and price increases. Agricultural production needs to be maintained. I am aware that the developers will claim to</p>

	<p>be providing green spaces, ponds etc. but why remove this green belt land by building on it? Leave it as it is. These fields are home to a lot of wildlife. Building on the land will remove habitats for rabbits, deer, birds and insects. This area is also overlooked by an area of outstanding natural beauty (Ashridge) and any view of such a large development will be a blot on the landscape. Light pollution will be visible from the surrounding hills. This area has been known to flood. Covering it in tarmac and concrete can only cause problems with increased surface water. I also have a concern about sewage and where this additional sewage will be dispersed. Access from Station road will cause potential danger and much increased traffic along station road towards the station and Aldbury. Every way you look at this, I fail to see how increased traffic, congestion and resulting pollution, can be seen as beneficial to the local community. Tring, Tring Station and Aldbury are rural communities. This development will completely change the character of these communities and the area in general.</p> <p>This development is unnecessary and should not be allowed to proceed.</p> <p>I object very strongly to this development.</p>
<p>3 Mansion Drive Tring Hertfordshire HP23 5BD</p>	<p>I have six reasons for objecting:</p> <ol style="list-style-type: none"> 1. 1,400 homes means an additional 4-5,000 people. While it is possible to build more schools, etc, the size of Tring town centre is finite. Increasing Tring's population so much, so quickly would severely strain its facilities. 2. Tring is a small and ancient market town with great historical character that attracts many visitors. Such towns are virtually an 'endangered species' in southern England and, therefore, worth preserving. 3. The site is an AONB. This application fails to meet any form of threshold that would allow the removal of AONB status. Wildlife in this area has already been under pressure from increased development in Tring and the surrounding area, not to mention the very large developments in Aylesbury and Aston Clinton. Protecting local wildlife in a period of climate change should be a high priority for Dacorum. 4. The application would contradict Dacorum's own criteria for protecting the Chilterns Beechwood SAC as this level of development, so close to both parts of the SAC, would very significantly increase human intrusion of the Beechwoods. 5. This application has been submitted before changes to the Government's required level of development in south-east England has been announced and is, therefore, premature. 6. The proposed site is quality productive farmland. Using it for housing would be a significant loss at a time when political affairs and climate change emphasise the need to become more agriculturally self-sufficient.
<p>50 vicarage road Leighton Buzzard LU7 9EY</p>	<p>I STRONGLY object to this proposed development for the following reasons:</p> <p>The development will be built on green belt land which is also</p>

	<p>adjacent to the AONB. Exceptional circumstances have NOT been provided to justify building on this green belt land. Dacorum Borough council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on greenbelt- this review should be allowed to be completed and the new local plan should be finalised before ANY greenbelt is sacrificed.</p> <p>The mere thought that we should sacrifice such an enormous portion of greenbelt land when we are in the middle of a climate emergency is absolutely ridiculous. We, as a countryside market town, should be leading the way in trying to protect this important land. It is completely unacceptable that this proposal should even make it to this stage. Huge new developments such as this one will increase pollution, risk of flooding, loss of wildlife and important habitats and will also change the character of this small, countryside town forever.</p> <p>This land has the protection of the Chilterns Beechwoods SAC (special area of conservation) This provides protection to green belt land near the Ashridge Estate and Tring woodland which the proposal is planning to build houses on. This is unacceptable and this proposal should never have been allowed to get any further for this reason alone.</p> <p>The scale of these plans are completely inappropriate to the current size of Tring. This development plus the Roman park development will increase the population of Tring by 34% which will break the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>The plans claim that there will be additional infrastructure provided by local authorities (Hertfordshire County Council and the NHS) however, there is currently no commitment from these public bodies to do so. I believe that the promises in these plans are all made up by the developer to make the public more willing to accept the plans.</p> <p>I am not against housing growth for Tring, but I believe that it should be more proportionate to the size of Tring and located closer to the main infrastructure. Developments should also not be built on important greenbelt land.</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and response.</p>
<p>23 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>The proposed development will overwhelm the already inadequate local community infrastructure (transport, schools, shopping etc etc) It will violate the Green Belt strategy and turn what is a precious rural environment into yet another urban jungle (more houses more strain on resources, more pollution).</p>
<p>28 Chapel Meadow Tring Hertfordshire HP23 5HB</p>	<p>I object to the proposal for a number of reasons 1) The development will considerably alter the character of Tring which has already seen the building of the large Roman Park estate. 2) The town of Tring does not have the amenities to support such a large population increase - the doctors surgery is already</p>

	<p>overstretched.</p> <p>3) There is an assumption, as with all new proposals, that residents will travel sustainably and not use cars for local journeys. This is a complete myth and will place additional strain on the local road system. Recent developments have insufficient parking for the 2 or 3 cars per household, and the new estate will become clogged with parked cars.</p> <p>4) The fields form a natural buffer zone to the canal. This is a vital wildlife corridor which cannot be replicated by the proposed limited thoroughfares for nature.</p> <p>5) The land is currently prone to flooding in winter. Additional housing will disrupt the already strained natural drainage, and potentially suffer from a high water table.</p> <p>6) The local area is already seeing extremely large scale housing developments (Aylesbury, Weston Turville) which have not influenced the Dacorum Plan because they are in a different borough, but will impact Tring and the surrounding villages.</p>
<p>28 Chapel Meadow Tring Hertfordshire HP23 5HB</p>	<p>I object on the grounds of the following:</p> <ul style="list-style-type: none"> - The Dacorum Local Plan has yet to be agreed - The scale of the development is far too great and would put pressure on local infrastructure - This is agricultural Green Belt Land and despite the grand claims would be a negative impact on biodiversity - This area is prone to flooding and may also cause further flooding in the town itself (e.g recent flooding of the Brook in Chapel Meadow)
<p>14 Chiltern Way Tring Hertfordshire HP23 5JY</p>	<p>I would like to OBJECT to the planning application for additional 1400 new homes in Tring, for the following reasons:</p> <ol style="list-style-type: none"> 1. The plot is green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on said land. 2. The proposal to build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. Any development to this site will damage the ecosystem and be of great detriment to the wildlife which people travel from many miles away to enjoy. 3. The need to build on a scale that is appropriate to the current size of Tring - this development plus Roman Park increases the population of Tring by 34%, which Tring's infrastructure cannot handle. 4. The new schools and health centres mentioned in the proposal have had no commitment from the appropriate bodies to fund or run these services (Hertfordshire County Council and Dacorum Borough Council) and NHS. Tring School has only recently been redeveloped, I do not believe there will be enough funds or the purpose in creating another secondary school so close to the existing one. 5. There are more appropriate places to build which are nearer to the

	<p>high street and existing amenities. There has been grazing land close to Tring Triangle and the A41 available for sale in the past couple of years which is within walking distance of the high street. I do not believe the residents of any houses at the far East of the proposed development will walk to the high street, which will create more traffic. The traffic and noise disruption for those of the Grove estate has been high for many years already with smaller new developments such as King Edwards Gardens and Thomas Gardens, plus additional houses being built on Station Road and Grove Road. In addition to the works carried out on Tring School as mentioned earlier. The road network cannot support the high volume of traffic created by building site vehicles, as well as the traffic of the two schools at the East edge Tring.</p> <p>6. The proposal claims to create affordable housing so that families who were from the area can move back. I however am sceptical the cost will be in line to allow this, going by the prices of houses in Tring which have shot up for 2-3 bed houses as much as an additional £100K in price in the past 3-5 years. I do not believe the new builds will be priced lower than the existing housing stock.</p> <p>Lastly, due to the large scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review the documentation and respond.</p>
<p>42 Weston Road Aston Clinton Hp22 5eg</p>	<p>To whom it may concern,</p> <p>I am writing to you to express my deep concern and objection for the planning application 22/01187/MOA which proposes to build 1,400 new houses in Tring as well as 2 schools and a community hub.</p> <p>I STRONGLY object to this proposed development for the following reasons:</p> <p>The development will be built on green belt land which is also adjacent to the AONB. exceptional circumstances have not been provided to justify building on this green belt land. Dacorum Borough council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on greenbelt- this review should be allowed to be completed and the new local plan should be finalised before ANY greenbelt is sacrificed.</p> <p>The mere thought that we should sacrifice such an enormous portion of greenbelt land when we are in the middle of a climate emergency is absolutely ridiculous. We, as a countryside market town, should be leading the way in trying to protect this important land. It is completely unacceptable that this proposal should even make it to this stage. Huge new developments such as this one will increase pollution, risk of flooding, loss of wildlife and important habitats and will also change the character of this small, countryside town.</p> <p>This land has the protection of the Chilterns Beechwoods SAC (special area of conservation) This provides protection to green belt land near the Ashridge Estate and Tring woodland which the proposal is planning to build houses on. This is unacceptable and this proposal</p>

	<p>should never have been allowed to get any further for this reason alone.</p> <p>The scale of these plans are completely inappropriate to the current size of Tring. this development plus the Roman park development will increase the population of Tring by 34% which will break the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>The plans claim that there will be additional infrastructure provided by local authorities (Hertfordshire County Council and the NHS) however, there is currently no commitment from these public bodies to do so. I believe that the promises in these plans are all made up by the developer to make the public more willing to accept the plans. This exact situation has happened recently in Pitstone on the new development at the end of Vicarage road where it was proposed that there would be a new nursery school/dentist/pub built but now the developers have totally gone back on their word and have now decided to build 13 flats on the area. Developers couldn't care less about local infrastructure. They just want to make as much money as they can from the projects and then they move on to the next town. I do not want this to happen in Tring.</p> <p>The infrastructure in Tring is already at breaking point with doctors surgeries and dentists being completely oversubscribed. The small roads in the town centre are difficult to navigate at the best of times and the increase in population will mean a higher volume of traffic and the town will become unlivable.</p> <p>I am not against housing growth for Tring, but I believe that it should be more proportionate to the size of Tring and located closer to the main infrastructure. Developments should also not be built on important greenbelt land.</p> <p>on a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p> <p>Thank you for your time, I hope you will consider these points and pass my comments on to the appropriate bodies.</p>
<p>26 Longfield Road Tring Hertfordshire HP23 4DG</p>	<p>This speculative application to massively increase the size of Tring would destroy the character of the small market town and overstress all the existing infrastructure. There is not sufficient local employment to require local housing at this scale, so inevitably this would be a dormitory development where the majority of people would commute out of Tring for work. The proposed development is too far away from the centre of Tring to allow easy walking to shops/services. I can see no justification for releasing green belt land for this purpose.</p>
<p>Ashridge House Orchard Gardens Tring Hertfordshire HP23 5FF</p>	<p>Dear Sir / Madam,</p> <p>We are writing to you in response to the proposed development of the Land East of Tring (reference number 22/01187/MOA).</p>

	<p>We object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>We, like many others, are not against housing growth for Tring. However, we believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p> <p>I hope our comments are taken into consideration.</p>
<p>4 The Grove Marshcroft Lane Tring Hertfordshire HP23 5PN</p>	<p>"I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new

	<p>local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>
<p>2 The Grove Marshcroft Lane Tring Hertfordshire HP23 5PN</p>	<p>This proposal constitutes a risk to the local ecology as it is within greenbelt. A proposal of this scale is likely to have an impact not only on the site ecology but surrounding areas such as Ashridge and Tring Woodlands including Aldbury Nowers with a significant increase in residents accessing these areas.</p> <p>The fields proposed for building are Marsh land and the impact of removing this will increase the likelihood of flooding in the surrounding areas.</p> <p>The development will significantly alter the character of Tring which is a small market town and in particular the east of Tring.</p> <p>Inevitably there would be an unsustainable increase in traffic through Marshcroft lane that although not a direct vehicle access route would be used as such with foot access to schools and the site being at the end of the Lane. The addition of vehicles using Marshcroft lane and parking to walk to school cannot be accommodated.</p> <p>The proposal would annex an important part of the lane and cause a significant change to the community of Marshcroft lane.</p> <p>The local plan had previously dismissed a proposal to develop in this area for these reasons.</p>
<p>6 The Grove Marshcroft Lane Tring Hertfordshire</p>	<p>I object to the planning application (22/01187/MOA) concerning proposed development on green belt land in and around Tring because it proposes:</p>

<p>HP23 5PN</p>	<p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. The developer's proposals fail to demonstrate the exceptional and very special circumstances which would be required in order to justify the release of green belt land for development. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park (currently under construction) increases the population of Tring by 34%, which will overwhelm the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>3. The developer's application proposes that additional infrastructure e.g. new schools and health centres, is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. The inclusion of such community facilities in the developer's plans in the absence of committed funding for the same is extremely misleading and the unfortunate reality is that such additional development is more likely to exacerbate problems with local infrastructure rather than ease them.</p> <p>4. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed (which I do not suggest to be the case) then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment and other residents.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41) and that any applications for such development must include fully-funded proposals for the significant additional local community infrastructure which would undoubtedly be required to support the additional population which would come with it. On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>1 The Grove Marshcroft Lane Tring Hertfordshire HP23 5PN</p>	<p>Dear Sir/Madam</p> <p>We are writing to place our objection to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the</p>

	<p>green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>We are not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Englemere 80 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I strongly object to the application because the proposed development is completely out of proportion to what Tring can cope with particularly taking in to account the Roman Park development which has already caused pressures on existing infrastructure, traffic etc.</p> <p>Given the number and complexity of the application documents it is unreasonable to expect the general public to properly digest the content and a longer period should be provided to allow for proper review and comment.</p> <ul style="list-style-type: none"> - The proposed development site is entirely within designated Green Belt land adjacent to an Area of Outstanding Natural Beauty - Green Belt can only be released for development in exceptional & very special circumstances. The hybrid application fails to demonstrate what, if any, exceptional circumstances exist - The Council should be exhausting the availability of other sites, including Brownfield sites and/or the more suitable location of TR01 thus allowing easy access on foot to the town centre and far easier access to the A41 rather than sacrificing Green Belt land - The proposed site has the protection of the Chilterns Beechwoods Special Area of Conservation, and it is difficult to see what possible mitigation measures could be adopted to minimise the impact of such a large development from Ashridge, Ivinghoe Beacon and Pitstone Hill thus destroying the rural and peaceful green character of the area - The proposed development is on such a scale in comparison to the

	<p>current size of Tring that it would destroy the character of this historic market town and its rural setting by increasing the population by some 34% (having taken into account the recent Roman Park development)</p> <ul style="list-style-type: none"> - There is insufficient infrastructure to cope with the proposed increase in population and the hybrid nature of the application means that the infrastructure proposed in the plan is not guaranteed - There would be an enormous increase in traffic onto Station Road, Cow Lane and Icknield Way none of which would cope without considerable development of the existing road network which would further ruin the rural landscape to the east of Tring - The proposals ignore the obvious extra demand from the occupants of 1,400 homes on hospital health care which is already under pressure. Building a health centre, which will only serve the new housing and would not alleviate the current demand on local hospitals - Site is currently cultivated as Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not concrete over farmland - The timeframe of the proposed development over 11 years (2022-33) means long drawn-out adverse impacts of construction, loss of amenity, increased demand on local resources. <p>In summary, I object to 22/01187/MOA on all of the above grounds and support the advice from Tring Town Council to the Dacorum Planning Authority to reject the application in the strongest possible terms.</p>
<p>Beacon View Orchard Gardens Tring Hertfordshire HP23 5FF</p>	<p>I strongly object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC , which provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure, for example new schools and health centres, that are to be provided by the local authorities and NHS, however, there is currently no

	<p>commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth in Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p> <p>Therefore, this planning application is completely unacceptable. I look forward to hearing from you.</p>
<p>Mentmore House Orchard Gardens Tring Hertfordshire HP23 5FF</p>	<p>I am writing to strongly object to the planning application 22/01187/MOA because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>19 New Mill Terrace Tring</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p>

<p>Hertfordshire HP23 5ET</p>	<p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>2 Astley Place Station Road Tring Station Tring Hertfordshire HP23 5QX</p>	<p>Dear Sir/Madam,</p> <p>I object to this proposal because:</p> <ul style="list-style-type: none"> - The proposed site is arable green belt, Chilterns Beechwoods SAC (Special Area of Conservation), which provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. I do not see any exceptional reason to justify a single house on this protected land, let alone 1400. - It merges Tring with the hamlet of Tring Station which as a resident I object to. - The roads in Tring station hamlet & Tring town are already busy, this will only exacerbate the problem. - It is in conflict with the current local plan which does not include this site.

<p>Rosebank Donkey Lane Tring Hertfordshire HP23 4DY</p>	<p>This is an appalling proposal. Tring is a market town of limited size and limited possibilities for expansion on such a ridiculous scale. The so called GREEN BELT has already been ignored and a huge development of homes in the east of the town was bad enough. I suppose the powers that be won't be happy until the Chiltern hills are completely trashed. So much for the preservation of green spaces and care for the environment. Don't do it.</p>
<p>87 Grove Park Tring Hertfordshire HP23 5JR</p>	<p>Like many others who have submitted objections I am against the proposed development for a number of reasons:</p> <p>1 Building on good quality agricultural land - now more than ever we should appreciate the need to retain such land for the production of food. Also, to build on green belt should be an absolute exception, not justified in this case.</p> <p>2 The infrastructure is already under strain. It is already near impossible to see a GP at present. The plan may include provision for a medical centre but that is no guarantee that funds will be made available to build it and more importantly it is unlikely that additional medical personnel will be available to staff it.</p> <p>3 Parking in Tring is already a major problem. Add another 1,400 houses and where will they park when visiting the town centre. It is too far away to assume that people will walk.</p> <p>4 Tring has already provided a large site to the West of Tring for large scale housing which threatens infrastructure and a fundamental change to our market town.</p> <p>5 The proposal is to access Station Road and Bulbourne Road, both of which are already busy roads and congestion can be expected. Marshcroft Lane must be closed off in order to avoid this narrow road becoming a "rat run" into town.</p> <p>6 The enjoyment of the public who benefit from accessing the hills beyond via Marshcroft Lane would be lost forever. Walkers, runners, dog-walkers and cyclists all gain great pleasure from the enjoyment this brings. It links to Pitstone hill, the Ridgeway and other places. Housing as proposed would ruin this environment.</p> <p>7 The sheer scale of the proposed development is completely out of scale to the market town of Tring.</p>
<p>Ashdown Station Road Tring Station Tring Hertfordshire HP23 5QU</p>	<p>I strongly object to this proposal. Reasons as follows (but not limited to):</p> <p>1. Building on greenbelt land, adjacent to an Area of Outstanding Natural Beauty (AONB) should not be permitted. There are no exceptional circumstances and it is not more sustainable to do so.</p> <p>2. The wonderful view of the Chiltern Hills over the AONB, from Station Road will be lost forever.</p> <p>3. Consequential development into the AONB is inevitable and is omitted from this proposal. Examples include station facilities, station car park, road and path infrastructure to the station.</p>

	<p>4. Consequential disruption into the AONB is inevitable with construction traffic and increased traffic thereafter.</p> <p>5. This proposal is a gross over development of Tring. It would fundamentally change our town, which does not have the infrastructure to support such growth.</p> <p>6. The ecological and carbon impact to Tring and the surrounding areas is unacceptable, particularly when other approved developments are considered. The area is home to many species of wild animal including badgers and red kites.</p> <p>7. The area is prone to flooding. This will either result in lots of new unhappy residents each spring, or a surplus of water being diverted into other parts of Tring, with unknown consequences.</p> <p>8. The proposal does not consider the adverse impact to the hamlet of Tring Station. Tring Station would become subsumed into Tring as part of this scheme and we would lose our community, by not only this, but the increased traffic diving the community into two.</p>
<p>31 Friars Walk Tring Hertfordshire HP23 4AP</p>	<p>I strongly object to this development being built on green belt land, close to AONB's and protected Chiltern Beechwood's. In the current climate emergency and concerns about wildlife extinctions, we should be preserving such land at all costs for current and future populations. There has not been a exceptional case shown for why this land should be used and brownfield sites should be looked at first alongside changing use of other buildings such as offices no longer used after changes in working practices.</p> <p>Developments on this site would be seen from high points of AONB such as Ivinghoe Beacon ruining its rural and green character. It would also take away prime agricultural land in a time when the Uk needs to focus on improving food security.</p> <p>The amount of proposed housing is highly disproportionate to the current size and character of Tring. It would completely change the small market town into an urban sprawl. The need for this amount of housing has not been shown in Tring. It is naive in the extreme to suggest that new residents would not all have at least one car which would greatly increase pollution and traffic congestion in the small town. Other infrastructure including health and local authority services (already under great pressure) would be unable to cope. Please do not agree to this hybrid application</p> <p>Finally the time given to read the numerous reports and pages was ridiculously short and more time should be given so that residents are aware of the application and can respond</p>
<p>Ty Isaf Trelewis CF46 6RD</p>	<p>In response to your letter to my family home address (Friars Gate, Marshcroft Lane) dated 13 April 2022, please see below my objections to the application.</p> <p>I preface my objections with the thought that the description "Land East of Tring" is misleading. The developer's description infers that they will be adding value to a derelict or otherwise empty area by adding houses, shops and so forth, when in fact this is a rural area bordered on four sides by main roads to the railway station and joining other parts of Tring to one another, to footpaths and to local villages.</p>

These fields are not a low value, unused area but are in fact treasured and integral to Tring life.

Marshcroft Lane is an Area of Outstanding Natural Beauty and Greenbelt land, with trees and hedges dating back over 500 years. The trees, wildflowers, hedges, ditches, and fields either side of the lane are recognised for its wildlife. The fields are of Grade 2 (very good/high quality) status.

We will lose biodiversity as a result of churning up the fields, digging down into the soil, the construction traffic, and then the human inhabitants and pollution from heating and vehicles. The developers claims that biodiversity will grow under this development are clearly not possible. If or when wildlife returns, it will be lost in houses in the same way that deer wander lost in the relatively new housing developments just across the border in Pitstone.

The proposal to build two estates of c.1400 houses with schools, surgeries, etc., will only have negative impacts on the town and people. Leaving aside the destruction involved in building on this land, the environment and local human and non-human inhabitants will never recover due to the many-fold increase in houses, population, pollution and so forth caused by the plan. The town centre will also be further damaged as shoppers either drift away to the estate for shopping, or yet another huge increase in population and traffic hits the town - bear in mind that there are currently several other huge housing developments taking place on the west side of the town. The town can barely cope with the current levels of traffic with parts of Tring Park being turned into car parks, and jams when buses pass through.

The building of the development will not improve access to the countryside, but destroy it. Marshcroft Lane leads to tranquil paths to the Grand Union Canal and reservoirs, and across Northfield Road to the Ridgeway, Ivinghoe Beacon and local villages. The area is enjoyed by walkers, cyclists, runners and horse riders. Many children learn to ride their bikes here due to the lack of traffic. It is the recommended route for ramblers to explore the area according to the official "Grand Tour of Tring" Guide. As a child, the local school took us on many trips down the lane to learn about the environment, pick blackberries, identify birds, animals and trees, and so on. Construction traffic, and the post-construction proposed road block to stop the new inhabitants coming through Marshcroft Lane, will put an end to educational and recreational use of the lane by locals and visitors.

The above descriptions of the area and its value to a wide variety of people serves to show quite clearly why building housing estates on this land is a plan which, quite reasonably, will be rejected in all reasonable ways by Tring people. The residents of Tring who have chosen to make their home in a country environment do not want to see that country environment wrecked by developers.

The Council has a clear responsibility to local residents and visitors to protect this Area of Outstanding Natural Beauty from speculators and

	<p>people who have no genuine interest in Tring and who will only "bury" it beneath housing if given the slightest opportunity. Such an outcome cannot be justified on any grounds.</p> <p>As the cost of living soars, inflation hits 40 year highs, we approach the 2030 climate target to cut emissions, and Dacorum has over 1500 empty properties, surely the council should be looking to get existing properties fit for habitation rather than continuing to damage the environment with the huge carbon footprint of building new developments, in particular in areas like Marshcroft Lane where the natural environment is fortunate to be flourishing.</p> <p>Please ensure my objections are properly considered as this unique and ancient natural environment, once destroyed, is irreplaceable. The impact of felling 500 year old trees and digging deep footings for these developments can never be repaired.</p> <p>I call upon the council to refuse the planning permission.</p>
<p>78 Broadstone Road Harpenden AL5 1RE</p>	<p>Thank you for consulting The Gardens Trust, of which HGT is a member.</p> <p>The site of the proposed development abuts the Chilterns AONB, is in the Green Belt and would cause harm to the setting of the Locally Listed Pendley Manor Historic Park. Sufficient justification for development on the Green Belt has not been made and is thus contrary both to the national NPPF policies and DBC current policies. Tring Park and Ashridge Park both suffer from public use with degradation of footpaths and other areas due to high usage. This would increase with the 1400 dwellings proposed. The development would also affect the historic designed long views from Ashridge at Duncombe and Aldbury Terraces, towards Tring, which have recently been the subject of a listing application to Historic England. The effect on Ashridge, Tring Park and Pendley Manor landscapes is contrary to NPPF and DBC Heritage policies.</p> <p>The site is not included in the current DBC site allocations (adopted 2017) and would not be suitable for the reasons given above. We thus object to this proposal.</p>
<p>30 Elm Tree Walk Tring Hertfordshire HP23 5EJ</p>	<p>I object to the Tring planning application (22/01187/MOA) because of the following:</p> <ol style="list-style-type: none"> 1. The Climate Change Emergency is not at the core of the Local Plan. The central thread of the Local Plan should be net zero carbon (ultimately zero carbon) emissions by 2030 and minimising carbon emissions during any construction. Although the Climate Change Emergency is rightly a headline statement in the plan, there is little follow through in the subsequent detail except ill-defined aims, such as promoting an unquantified reduction in greenhouse gas ("GHG") emissions. 2. The promotion of renewable energy as proposed in the plan is insufficient to meet the challenge of the Climate Emergency. To achieve net zero emissions by 2030 all new homes and offices must have: <ul style="list-style-type: none"> · maximum insulation, · only utilise electrical energy,

	<ul style="list-style-type: none"> · must have rooftop solar panels installed at the time of construction, · must be fitted with efficient heating such as air source heat pumps. · All public transport must be electrified. · All construction should be done with sustainable materials or low embodied energy or carbon. · At construction provision must be made for home electric vehicle chargers and an adequate number of community fast chargers. · All power must be supplied by electricity or hydrogen generated from sustainable energy sources. <p>3. The plan we wish to see preference given to developments which fit with the likely changes to working patterns in the aftermath of the COVID-19 epidemic. Priority should be given to plans and developments which will support local green business, including green STEM businesses, close-to-home communal office space, green domestic builders & installers to help decarbonise Dacorum, and small businesses selling locally sourced goods.</p> <p>4. Affordable housing needs is not properly defined in the plan and must contain an adequate proportion of social housing with rents set at no more than a third of the average income of workers in Dacorum.</p> <p>5. The proposals in the plan for infrastructure and employment growth are not sufficient for the number of new dwellings proposed in these market towns.</p> <p>6. The plan does not guarantee the protection of existing natural habitats and creation of new ones by rewilding. It must ensure that there are migration corridors that connect the green spaces as far as possible to increase biodiversity.</p> <p>7. What guarantees are there that any environmental or rewilding plans will actually be delivered?</p> <p>8. Has adequate consideration been given to the provision for utilities such as water, gas, electricity and for doctors, dentists and school places that will be required for the additional 1400 homes? That could be an additional 3000 people - an increase of around 1/3 of the current population of Tring.</p>
<p>1 Hazely Tring Hertfordshire HP23 5JH</p>	<p>I object to the planning application (22/01187/MOA) for the following reasons:</p> <p>In addition to all of the very valid points made below I would like to add that it would be unforgivable to irrevocably destroy this area which is a source of peace and nature to the whole community not just those living in Tring but to those from surrounding areas who come to Marchcroft Lane and the canal/reservoir areas to share in the wildlife that it provides. I have lived in Tring for over 50 years and have enjoyed being able to share this amazing location with my children and grandchildren to help to educate and encourage them to appreciate nature and their surroundings. Please do not allow this area to be destroyed, as it would undoubtedly be, if this huge development were to be approved. It should be Tring's legacy to it's residents and those of the surrounding area. I recognise that development is needed but please look for other places in the area to do this and do not allow the destruction of an area of such outstanding natural beauty.</p> <p>I feel that the developers are just trying to wear everyone down in an effort to push their undesirable plans through. Please do not allow us to be bullied;</p>

	<p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>3 Mansion Drive Tring Hertfordshire HP23 5BD</p>	<p>My reasons for objecting to this proposal are:</p> <ol style="list-style-type: none"> 1. An extra 1400 homes in Tring, in addition to the large development at the top of Western Road, Tring, will increase the population of Tring by about 50%. By any reasonable assessment this is unacceptable, both because it would change the character of Tring as a small market town and because there is insufficient infrastructure to support such an influx. Tring already has poor local facilities for residents; a development this size would only make the problem worse. What makes up for the poor local facilities is the beautiful surrounding countryside, so any attempt to destroy that countryside should be resisted. 2. The site is AONB. The application fails to demonstrate that it provides sufficient protections to allow that AONB status to be removed. The AONB is essential to preserve and support local wildlife which is under increasing pressure from building developments within Tring and the surrounding area, both within Hertfordshire and immediately to the west of the county where it meets Aylesbury Vale. The environment and local wildlife habitats should be regarded as a priority issue because climate change is resulting in a very significant reduction in UK wildlife both nationally and locally. 3. The application, if allowed, would be inconsistent with Dacorum Council's stated intention to protect the Chiltern Beechwoods SAC. A development of this size, sited so close to both parts of the SAC,

	<p>would severely increase the numbers of people using the Beechwoods and could only result in further damage to the SAC.</p> <p>4. Parts of the proposed site have been subject to flooding during high winter rainfall in recent years and presumably should be regarded as a flood plain as it helps to reduce some of the excess rainfall that drains down to the area around Tring Station.</p> <p>5. The proposed site is quality productive farmland for summer crops. UK Government policy is to be more self-sufficient in food production, both for reasons of climate change and problems with obtaining food from overseas.</p> <p>6. For the record, the developers did a small and very limited exhibition in Tring, which was poorly attended by residents because of Covid restrictions and inadequate advertising. The current application runs to a very large number of pages and residents will therefore have found it difficult to comment on some of the detail.</p>
<p>The Standings 6 Stocks Farm Barns Stocks Road Aldbury Tring Hertfordshire HP23 5RX</p>	<p>I am writing to object to this large scale planning development near Tring. This area already has a large housing development being built and this further one would destroy the area. Developers wish to build on and near green belt as the selling prices they can charge are way higher than brown areas - but that is no reason to build. The road and rail infrastructure also wont be able to cope and these are not in the control of the council or the developer so it will be chaos. This is a beautiful area which will be destroyed by this development.</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>Badgers Crossing 3 New Ground Road Aldbury Tring Hertfordshire HP23 5RJ</p>	<p>Dear Sirs / Madam,</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1)To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Furthermore, this development directly undermines the critical need to manage the threat to biodiversity and preservation of nature which has been recognised UK wide. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise</p>

	<p>the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2) To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3) To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4) Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>I have lived in or around Tring for the past 47 years and have witnessed the rapid development of the town. I believe any further expansion of Tring will require significant investment in its infrastructure (e.g. Schools, Medical Services, Roads etc.). I object to this specific planning application based on the above points. However, I also object to any further expansion of Tring unless there is a clear and unambiguous investment plan that is aligned to the planning application.</p>
<p>27 Morefields Tring Hertfordshire HP23 5EU</p>	<p>Object for following reasons: Green Belt Land Concern for wildlife and biodiversity, due to closeness of AONB and Chilterns Beechwoods SAC Concerns over the infrastructure of Tring Scale of development is totally unsuitable for a small market town</p>
<p>12 Manor Street Berkhamsted Hertfordshire HP4 2BN</p>	<p>This is Green Belt/AONB Land and should therefore be protected areas.</p> <p>Site is currently cultivated as Grade 2 agricultural land.</p> <p>DBC have declared a climate and ecological emergency and these proposals which would have an extremely detrimental effect on our Chiltern countryside, its AONB and the market town of Tring.</p> <p>This development is of a too larger scale and will have an major impact on our environment and nature and wild life such as diversity of plant species, the air we breath and pollination of plants.</p>
<p>6 Valpy Close Wigginton Tring Hertfordshire</p>	<p>I strongly object to the plan to build up to 1,400 houses on Green Belt land. This is an overcrowded area as it is. Tring is so full of people and cars now that it is in danger of becoming completely overwhelmed. Roads are too busy, not enough parking spaces for the</p>

<p>HP23 6EY</p>	<p>numbers of cars and local amenities such as GP surgeries full to bursting and unable to cope. Green Belt should stay green/undeveloped. That was the plan originally. Why is it possible to now build on it? The wider area is one of AONB. It is essential to keep this unspoilt and wildlife protected. There is simply no room for more people and cars in an already overcrowded area. Tring and Aldbury are small towns. That is their charm, already threatened by overdevelopment. Surely a massive new housing development, such as proposed, should be sited close to a large town/city? Not as an adjunct to already over developed small towns? Please, please do not let this go ahead.</p>
<p>The Stables Pendley Farm Station Road Tring Hertfordshire HP23 5QY</p>	<p>We have enormous concern about the proposal and its affect on Tring and the surrounding neighbourhood. Specifically;</p> <ul style="list-style-type: none"> - 1. It is fundamentally wrong for a proposal to build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. As far as we are aware, there are no exceptional circumstances to justify building on green belt land, particularly when Dacorum Borough Council are reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt 2. Furthermore this proposal is to build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. The scale of the development is inappropriate to the current size of Tring i.e. this development on top of the Roman Park is totally out of proportion and will change the character of this historic market town forever. 4. If a further sizeable development is to be considered for Tring, there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. If it becomes essential to sacrifice some green belt land then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>We are not against some further housing growth for Tring, however, we believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p>
<p>Marshcroft House Marshcroft Lane Tring Hertfordshire HP23 5QN</p>	<p>Ref. Planning Application ref. 22/01187/MOA To Whom it May Concern, Thank you for your letter dated 13th April 2022 relating to the above planning application. I am writing to object to the above proposal on the grounds that it is an inappropriate development within the established Green Belt in Dacorum, adjacent to an Area of Outstanding Natural Beauty. The proposed development would result in the complete loss of approximately 121 hectares of quality, productive agricultural land -</p>

	<p>with the associated impact on food security and environmental impact. The proposal goes against Dacorum Borough Council's current Adopted Core Strategy Policy CS5, which itself follows national planning policy for development within the Green Belt. The proposed development fails all respects of National Planning Policy Framework [July 2021 edition] paragraphs 148, 149 and 150, "Proposals affecting the Green Belt".</p> <p>While I recognise that the Adopted Core Strategy in Dacorum is subject to review, this review has not yet been completed. Until this has been completed, Dacorum Borough Council cannot demonstrate that all other avenues have been exhausted and therefore the application for any green-field development on the Green Belt should be refused.</p> <p>The applicant's "hybrid planning application" should be rejected on the grounds that there is no requirement for the "Full application" part [the two access points at Station Road and Bulbourne Road], without there being approval (in principle, implied or otherwise) for the "outline part" [outline planning permission for up to 1400 houses, schools, etc.]. Granting approval for the "Full application" part could be construed as expressing support for the "Outline application" part - which would likely compromise the future objectivity of the planning authority.</p>
<p>2 Marshcroft Cottages Marshcroft Lane Tring Hertfordshire HP23 5QN</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed</p> <p>The area proposed to be developed is productive farm land. At a time when this country should be producing more of its own food, rather than being reliant on Ukraine or Russia this proposed development would be taking land. which is providing crops and cattle, out of producing and filling it with mouths to feed.</p> <p>The land is also habitat to many types of wild animals which would be displaced.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the</p>

	<p>impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>1 Marshcroft Cottages Marshcroft Lane Tring Hertfordshire HP23 5QN</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this</p>

	<p>review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>4 Goldsworth Road Tring Hertfordshire HP23 5FY</p>	<p>Objection due to :</p> <p>This is a Green Belt Area - these are protected areas and should not be built on especially to this extent !</p> <p>There are estates already being built in many surrounding areas - either recently completed, part way through build or approved and about to start - areas such as Aylesbury, Pitstone, Aston Clinton, Cheddington and Tring (excluding this proposal). Are 1400 homes in this proposed location therefore actually needed, appropriate with the pressure already placed on the local area by all the already approved new build estates.</p> <p>The roads in certain areas cant cope now - 1400 homes must bring over 2000 cars. The roads will be impossible and the parking in places terrible too. Local roads in many areas are single track lanes or very narrow due to parking ie Brook Street and the high street. How will these areas cope ? (and no you will not convert car drivers to suddenly use a bus !!!)</p> <p>Have you explored derelict land? Industrial estates and other such "built up " areas ? Rather than destroying green belt ?</p>

	<p>Have you looked at creating more NEW TOWN models - rather than attaching this kind of a development to an already pressurised, town ?</p> <p>The local hospital is surely too far if this proposal goes ahead plus other medical facilities are seriously stretched already - what will this development do to fix that if this outrageous proposal goes ahead ? There is no dentist here that you can sign up to at present - how many dentists surgeries will be opening to fix demand now and for the future ?</p> <p>You say you wish to encourage walking - the Bulbourne Road - one main access road to this proposal is not suitable or safe today for pedestrians. No one at the town hall event seemed to care or be able to address my comment on this.</p> <p>I know of planning permission that has been rejected due to lack of green planting on a driveway - yet right opposite you wish to place 1400 homes on green belt land - how can there be such inconsistency?</p> <p>In conclusion - building on green belt land is a terrible proposition and the quantity of homes puts an inordinate amount of pressure on the infrastructure in the area. This is too big as a proposal and puts a mockery to the protection of green spaces. There is enough building in this area, we have supported the new build requirement heavily in this area and this plan needs to be halted.</p>
<p>Rosslyn 13 Bulbourne Road Tring Hertfordshire HP23 5HF</p>	<p>I am writing to strongly object to the planning application 22/01187/MOA because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt

	<p>land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p> <p>I strongly object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Beauchamp House 8A Bulbourne Road Tring Hertfordshire HP23 5HF</p>	<p>I strongly object to this planning application because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in

- urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.
- 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.
- 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.
- 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.
- 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.

I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).

On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ." I strongly object to this planning application because it proposes:

- 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.
- 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.
- 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.
- 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.
- 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the

	<p>impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p> <p>I strongly object to this planning application because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>8 Bulbourne Road Tring Hertfordshire HP23 5HF</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns

	<p>Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>2 Ridge View Tring Hertfordshire HP23 5PU</p>	<p>I am a Tring resident and wish to formally object to the Planning Application 22/01187/MOA (Marshcroft Lane) on the following grounds:</p> <p>1. The Application represents a gross overdevelopment of the area, entirely inappropriate in a Market town the size of Tring, especially in addition to the existing development at Roman Park.</p> <p>2. The area is designated Green Belt Land. There are other alternatives which render this case for developing green belt untenable. If Green Belt is to be sacrificed for profit then the TR01 area represents a less invasive impact on the environment</p> <p>3. The land has the protection of the Chilterns Beechwoods SAC. This undeveloped, natural land is clearly very precious to the local community.</p> <p>4. The Application proposes developing land immediately adjacent to a designated AONB. These areas demand special consideration when reviewing any planning applications on adjacent land. This proposal would severely degrade the AONB.</p> <p>5. The application mentions the provision of Medical and Social facilities, but fails to identify any commitment from any source to fund these gratuitous offers. It would certainly not be the developer sacrificing any of its significant profits to fund community services.</p> <p>I would be grateful if would include my objection points when viewing the application.</p>

<p>5 Netherby Close Tring Hertfordshire HP23 5PJ</p>	<p>Planning application 22/01187/MDA We strongly object to the proposed planning application which is wholly disproportionate to the needs of Tring, will destroy current green belt land and be counterproductive to Tring as a whole. Reasonable future development on brownfield sites should be the future in parallel with much greater infrastructure investment for town.</p>
<p>Mon Nid 32 Marshcroft Lane Tring Hertfordshire HP23 5PP</p>	<p>Good morning</p> <p>I have attempted to access your online public page to lodge my objection to the above planning, but have not been able to get in. Therefore, I'm adding my objection here - I fully concur with all the objections already noted by GFRA, of which I am a member.</p> <p>Tring is a lovely market town with hundreds of years of history, and already has enough residents for its current infrastructure. There are no commitments from Harrow Estates to build anything other than houses, so this will clearly overstretch our schools and GP surgeries etc.</p> <p>But most worrying is the complete disregard for the status of Green Belt land, Areas of Outstanding Natural Beauty, and Special Areas of Conservation. This reckless abandonment of common sense across our country, with respect to the greater issues of climate change, will be disastrous in the not very long term. We have to find a way to allow for the increase of housing while preserving the biodiversity on which we are utterly dependent.</p> <p>I trust you will do everything in your power to prevent this application from being approved.</p>
<p>21 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>We wish to raise objection to the above planning application for the following reasons:</p> <ol style="list-style-type: none"> 1. Green Belt Land - should be protected in line with original green belt aims to prevent urban sprawl. Arguably the area east of Tring is the first large area of green space west of London. 2. AONB - Tring is the Gateway Town to the Chilterns AONB, the site is overlooked by some of the finest wild life sites in Herts. 3. Dacorum Development Plan - A new local plan is proposed, to be submitted in October 2025, with a further public consultation to be held in June 2023. No ad hoc decisions should be taken before this date. 4. Local Infrastructure - Tring is a small market town, the facilities offered can only accommodate the needs of the present population. In particular medical facilities and reliance on hospitals outside the area already coping with the needs of large towns. Additionally the road infrastructure giving access to the site is inadequate, both Bulbourne Road and Station Road/Cow Lane already carry large volumes of traffic accessing the A41 and onward to the M25. 5. Tring Character - Tring has a unique character and architectural style, this should not be put at risk by being overwhelmed by the current excessive building schemes.

	<p>6. Environmental impact - As already mentioned this is green belt land and should not be lost to such a development. The impact of such a large built up area on the local wild life and the pollution caused by so many vehicles accessing the site both during construction and when occupied, is immeasurable.</p> <p>7. We suggest you take a walk, with the Tring Town Council members, along the Ridgeway Path at Aldbury Nowers to visualise the impact such a development would have on Tring and the surrounding area!</p>
<p>2 Grove Leys Grove Road Tring Hertfordshire HP23 5PB</p>	<p>We are writing to place our objection to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>We are not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Grove Lodge Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I object to planning application (22/01187/MOA) because -</p> <p>It is green belt with Beechwoods SAC protection and adjacent to one of the most beautiful and serene amenities we have in Tring - the canal, which would inevitably suffer severe detriment if this development goes ahead.</p> <p>It is also out of proportion to the existing population of Tring, especially added to the existing Roman Park development, Tring's whose would be changed for the worse.</p>

	<p>I recognise that more housing is needed and must be subject to provision of supporting infrastructure, but the other sites available to the east of Tring and closer to the centre should be given priority over this site.</p> <p>I also note the short time the public have to comment and believe the response time should be extended and the application more widely publicised to encourage more comments.</p>
<p>19 Christchurch Road Tring Hertfordshire HP23 4EE</p>	<p>26th April 2022 Dear Sirs,</p> <p>Re: Planning Application 22/01187/MOA</p> <p>I object to the planning application (22/01187) because it proposes:-</p> <ol style="list-style-type: none"> 1. To build on Greenbelt land. This planning permission is seeking to build on a site that is 100% Greenbelt land. The Greenbelt was introduced for a reason; to be a barrier between built up areas and the countryside and to ensure that this was maintained. The reasons for its introduction are still relevant today and perhaps even more relevant with the stresses of modern life. Tring is set in the Chilterns, in an Area of Outstanding Natural Beauty, and surrounded by Greenbelt land. Greenbelt is only allowed to be built on in exceptional and very special circumstances and these have not been provided to justify building on this greenbelt thereby failing the government's prerequisite requirements for permission to build on greenbelt land making this application null and void. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt land is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on land which abuts the Chilterns Area of Outstanding Natural Beauty. This development will be visible from the high points of the Chilterns Area of Outstanding Natural Beauty, thereby destroying its rural and peaceful green character. 4. To build on land which is currently cultivated as Grade 2 agricultural land. Nationally we need to increase our food self-sufficiency, not concrete over farmland. 5. To build on a scale that is inappropriate to the current size of Tring. This development plus the on-going development of Roman Park increases the population of Tring by 34%. Tring is a small market town in a rural setting and a massive influx of people would drastically and adversely change the character of the town forever and this

development would change the rural nature of the town's setting forever. Block developments tend to be bad for towns, in terms of changing the character of a town and this development would irreversibly change the character of this historic market town forever.

6. To take no account of the impact on the local infrastructure as there does not appear to be any thought as to whether the local infrastructure, including the road systems can cope. There has been considerable expansion of Aylesbury and with planned housing in the soon to be decommissioned RAF Halton there is already pressure on the local roads. This development is very much on the edge of the town and consequently the vast majority of needs for people living in this proposed development would involve driving and would have a massively adverse impact on the roads. Additionally, has any consideration been given to the massively increased pressure that the local infrastructure, such as, parking, water availability, sewage structure etc would be under? This plan just seems to have slotted housing on the very outer eastern edges of the town beyond the current housing boundaries with no regard for the character nor infrastructure capabilities of the town.

7. No committed infrastructure, as whilst there may be new schools and health centres in the plan these would need to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and the NHS, there is currently no commitment from these public bodies to do so. Whilst the developer states that it will contribute towards the cost of such infrastructure there is no reference to what this 'contribution' would be and therefore, it is far from fully funded. Currently Tring has one secondary and the vast majority of the children attend this school giving a sense of common purpose and a truly comprehensive schooling system and having split secondary education would undoubtedly adversely change the character of the town. Additionally, the schools would need to be in place before any sizeable housing development takes place as all primary schools and Tring (Secondary) School are full to capacity and whilst Tring School is being rebuilt there is no additional capacity being added.

8. To take no consideration of the extra demands on local hospital health care, which is already under extreme pressure. Building a health care centre, which will only serve new housing, does not alleviate demand on local hospitals.

9. No provision for local jobs and services. There does not appear to be any thought as to providing local jobs and services for any proposed residents therefore adding to the pressures on the local road network as people need to commute to their places of work.

10. A planning application for a site which is not wholly owned by the developer. The developers, Harrow Estates/Redrow, do not own the whole site so there is no commitment that the site would be developed as is outlined in the application.

11. The application is hybrid. This means that permission is being sought for some of the site with full details of the remainder to follow. This can be interpreted as seeking outline planning permission for the

	<p>development of the site as a whole, with specific details on house design, location of school (indicated as possible only), service roads etc, to be sought later.</p> <p>12. A timeframe of development of over 11 years (2022-33). This would mean a long drawn out adverse impact of construction, loss of amenity, increased demand on local resources without obligation for developer to provide infrastructure, and other associated adverse effects, especially for presently neighbouring residents.</p> <p>13. To take no account of the fact that there could be more suitable locations which are closer to the local road infrastructure of the A41 and close enough for people to walk into the town centre. I am not against housing growth for Tring, however, I believe it should be on a more proportionate scale bearing in mind the size of Tring and that any such development should be located closer to the main infrastructure of Tring.</p> <p>On a final note, due to the scale of the planning application document (over 140 separate documents and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p> <p>Thank you for taking my opinions into account when considering this planning application.</p>
<p>15 Railway Cottages Station Road Tring Station Tring Hertfordshire HP23 5QT</p>	<p>Considering we have had a development already at the East end of Tring, the number of dwellings proposed is overdevelopment and not suited to the area of outstanding natural beauty that is Ashridge and the Ivinghoe Beacon.</p> <p>The creation of this development will remove valuable green spaces for local families and increase pollution and noise with a huge increase in traffic. It is likely that those in the proposed houses will need to use schools and nurseries that will not be provided immediately with this development, the commuting to which, and onwards to the station will make Station Road a busy main road completely out of character with the town.</p> <p>The infrastructure proposed for this development of the schools and community areas I can not see happening at the same time as the dwellings and therefore the strain on local services will impact the lives of residents already living in the community. An already busy and crowded station car park and trains will become overburdened and it will become extremely hazardous with traffic near the main road and station at Tring Station.</p> <p>This proposal is completely unnecessary for Tring and because of property values in Tring they will not be affordable either. I strongly object to a proposal of this size being forced between Tring and Tring Station.</p>
<p>28 Hollyfield Close Tring Hertfordshire</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of

<p>HP23 5PL</p>	<p>Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to be completed, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>2 Posting House Tring Station Tring Hertfordshire HP23 5QS</p>	<p>I object to the development on the following grounds:</p> <p>The proposed development would effectively create a new built land bridge between Tring and Tring station. From my experience of living at Tring Station, we have our own community identity comprising the Fog Cottages, Posting Houses, Royal Court, Clarke Springs and properties along Station Road; with the Iron Room on Station Road being our shared community space. Geographically, Albury is our next nearest local community and closest shop, Post Office, school, cafe, pub and Church. The majority of Tring Station Primary age Children attend Albury Primary school, strongly reinforcing our community ties with Albury. In my view, the proposed development threatens the existing local community balance with the creation of a hard built link to Tring, which over time might fundamentally and irreversibly change the Tring Station community identity and strong connection to Albury.</p> <p>In addition to the above, I would urge those with whom the planning decision resides to walk the Ridgeway path from Bishops Wood (south of Tring) to Ivinghoe Beacon (northeast of Tring), constituting the high ground overlooking the local area. Many tourists and Londoners travel to Tring Station to step out of the station into beautiful countryside for walks along the Ridgeway, Chiltern Way and the Grand Union canal. From Pitstone Hill on the Ridgeway, the full</p>

	<p>vista of land proposed for development can be seen within the context of the landscape stretching out towards Tring, Wendover and across the county. The proposed development would irreversibly change this view by turning over a substantial proportion of farmed greenfield land to buildings, which in my view would constitute a vandalism of the landscape in this area. From Pitstone Hill, the much smaller Pitstone chalk pit development (I think about 200 units built within the last 8-years) can be seen, which appears as an out of place blight within the overall landscape . A development of the scale proposed would be a far more tragic loss of Hertfordshire landscape.</p>
<p>3 Grove Leys Grove Road Tring Hertfordshire HP23 5PB</p>	<p>The local plan has not been finalised so how can a development like this be considered at this stage? Development on Green Belt requires exceptional circumstances. I do not believe these circumstances exist for this proposal. The site adjoins an AONB and will be detrimental to the AONB both in terms of ecology and visual intrusion. The scale of development is out of proportion to the scale of Tring as a market town. There is no commitment to the infrastructure that would be required to support a development of this scale. Marshcroft Lane is a special green corridor and is widely used for recreational purposes. Imagine a roundabout/traffic lights halfway down Marshcroft to provide for the proposed new crossing road to realise the folly of this proposal!</p>
<p>21 Dunston Hill Tring Hertfordshire HP23 4AT</p>	<p>The whole site is in designated Green Belt Green Belt can only be released for development in exceptional & very special circumstances The proposals fail to demonstrate exceptional circumstances (see National Planning Policy Framework revised 20.7.21 in particular paragraphs 147-9) The site abuts the Chilterns Area of Outstanding Natural Beauty Development will be visible from the high points of the AONB, such as Ivinghoe Beacon, thus destroying its rural and peaceful green character Site is currently cultivated as Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not concrete over farmland Large number of dwellings will drastically and adversely change the rural setting and character of the market town of Tring Increase in traffic Despite developer's proposals to include some community infrastructure, such as two schools, this is not guaranteed, as this is a hybrid planning application Developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution' Proposals ignore extra demand on hospital health care, already under pressure. Building a health centre, which will only serve new housing, does not alleviate demand on local hospitals Developer (Harrow Estates/Redrow) only owns part of the site (that nearest to Station Road) so no commitment that the site would be developed as is outlined in this application Timeframe of development over 11 years (2022-33) means long drawn-out adverse impacts of construction, loss of amenity, increased demand on local resources without obligation for developer to provide</p>

	<p>infrastructure, and other associated adverse effects, especially for presently neighbouring residents and parking in town centre This site falls within the Chilterns Beechwoods Special Area of Conservation (SAC) - March 2022</p>
<p>Trinity Toms Hill Road Aldbury Tring Hertfordshire HP23 5SA</p>	<p>I am writing to object to the above planning application to develop this area with a large number of houses. I am concerned that the impact on the town's facilities, the railway station and local health care would be totally unacceptable.</p> <p>Living in Aldbury I would be badly affected by increased traffic flow through the village and increased footfall in Ashridge which is already under threat.</p> <p>Tring has recently had a large number of houses built at the far end of the town which are putting pressure on all local facilities .</p>
<p>Walnut Tree Cottage 3 Toms Hill Close Aldbury Tring Hertfordshire HP23 5SL</p>	<p>Please note that I have the following objections to the 'Marshcroft Garden Suburb' proposed development.</p> <p>I am totally opposed to it for the following reasons:</p> <p>It is on green belt land which we need for growing food, not houses. It is next to the Chilterns Area of Outstanding Natural Beauty. No special reasons have been put forward to justify using green belt land like this.</p> <p>The new rules for the Chilterns Beechwood SAC, which is in the area, must apply and no adequate mitigation has been proposed.</p> <p>The scale of the development is out of all proportion to the size of Tring, which already has a lot of extra new housing.</p> <p>The hamlet of Tring Staion would be overwhelmed.</p> <p>Tring Station does not have sufficient facilities for the extra usage.</p> <p>The developers state that facilities such as schools and a medical centre will be provided but do not say by whom. They do not say they will fund this, only that the land will be provided. It seems unlikely that the relevant authorities will provide funding. Tring School is near and has very recently been rebuilt, so it is unlikely the education authority will spend more on a new secondary school nearby.</p> <p>Dacorum Council should focus on finalising the Local Plan so that there is a framework for development in the borough and so that massively oversized and inappropriate schemes such as this never see the light of day.</p>
<p>1 Hollyfield Close Tring</p>	<p>As a homeowner directly alongside this planning application (22/01187/MOA) I strongly object because it proposes:</p>

<p>Hertfordshire HP23 5PL</p>	<p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41).</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>3 Ridge View Tring Hertfordshire HP23 5PU</p>	<p>1. The proposed land is part of the Green Belt which, although originally intended to protect open land, is now recognised for having so many other benefits. These include providing areas for walking/ other countryside activities, helping to slow climate change, addressing air pollution, and providing essential habitats for wildlife. The land subject to this planning application is presently home to roe deer, foxes, countless bats, owls and pheasants. All this would be lost if the application goes ahead.</p> <p>The land has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation) which provides protection to Green Belt land near the Ashridge Estate and Tring Woodland.</p> <p>Quite rightly Dacorum Borough Council is currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the Green Belt. The review must be allowed to complete and a new local plan finalised before any green belt is sacrificed. Such an approach is in line with current Government strategy not to build on Green Belt unless there are exceptional circumstances which there</p>

	<p>are not.</p> <p>2. The scale of the development is inappropriate for the historic market town of Tring and the local infrastructure. The whole character of the town will be changed should the development be allowed. From looking through all the comments opposing the application and other comments made at the various public meetings, Tring residents do not want such a massive change to take place. This view must be respected.</p> <p>3. The developer has allowed for new infrastructure in the planning application including "a new local centre and sports /community hub, primary school, and secondary school". However there is no commitment by Local Authorities and Public Bodies to provide this infrastructure. There is a risk that such areas and "the public open spaces as alternative to Green Belt" will just become sites for additional housing. In the meantime, without the land being managed it will become an overgrown eyesore.</p> <p>4. Housing growth in moderation is necessary if only to provide opportunities for people to move from more urban area to take advantage of the countryside. More affordable homes are also required in Tring. However there is a more suitable location (TR01 - near the Tesco superstore) with better access to the town centre that minimises the impact on the environment and avoids the need to destroy Green Belt.</p>
<p>11 Netherby Close Tring Hertfordshire HP23 5PJ</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1) To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2) To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3)To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4) Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5)To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to</p>

	<p>walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>23 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>See full response within the application's documents on DBC's website.</p>
<p>19 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>I should like to register my objection to the application. It is not possible for the council or individuals to make an informed assessment of the proposal for two reasons: first, because the planning framework by which to judge it is still in the process of being developed by our elected representatives; and second because the detail of the plan is illustrative and so provides no firm basis for assurance of the eventual project. In the circumstances, an opportunistic application for such a large-scale development is totally inappropriate.</p> <p>While there may be a valid case for considering a significant expansion for Tring, it should be examined in a measured and democratically-led manner, and in conjunction with an expansion of all the required supporting community and transport facilities.</p>
<p>17 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>I object to the planning application (22/01187/MOA) because of:</p> <p>The prematurity of the application, before any mitigation plans have been prepared for the Chilterns Beechwoods SAC (Special Area of Conservation), and before the new Dacorum Local Plan has been agreed.</p> <p>The Chilterns Beechwoods SAC mandates mitigation from the pressure of visitor numbers from a Zone of Influence (Zol) around Ashridge and Tring Woodlands. As well as the land around Tring, such as this significant proposed development, the Zol covers areas around Aston Clinton and Aylesbury which have already significant housing developments just constructed or approved, such as the Buckinghamshire Advantage approved development from Aylesbury up to the Arla factory near Aston Clinton. All these developments will need to be considered in mitigation plans.</p> <p>Natural England also requires a Habitats Regulations Assessment to include demonstrations of Water Neutrality and Nutrient Neutrality. This has not been prepared yet; the developers have only included a "Report to Inform a HRA" which has minimal information on</p>

hydrological abstraction, sewage, surface water and nutrient run-off from the existing farmland.

The proposals to create a SANG to fulfil HRA requirements seems incomplete and solely focused on the development itself; with proposals for a cafe to attract visitors, it would increase footfall from people visiting both that and Ashridge from a wider area, compromising the Chilterns Beechwoods SAC; and there seems little provision for car parking that such a provision would require.

To build on Green Belt land which is also adjacent to the Chilterns Area of Outstanding Natural Beauty needs to demonstrate very exceptional circumstances. Exceptional circumstances have not been provided to justify building on Green Belt land. Dacorum Borough Council is currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the Green Belt - this review should be allowed to complete, and the new local plan should be finalised before any Green Belt is sacrificed.

The site abuts and affords the setting for the Chilterns Area of Outstanding Natural Beauty.

The development will be visible from the high points of the AONB, such as Ivinghoe Beacon, thus destroying its rural and peaceful green character.

The developers' "Very Special Circumstances" are very generic, and could be applied to many more suitable or brownfield sites. There is no good justification why this site should be chosen over others. See National Planning Policy Framework revised 20.7.21 in particular paragraphs 147-9

This development is on a scale that is inappropriate to the current size of Tring i.e. this development plus the already constructed Roman Park increases the population of Tring by c. 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.

Additional infrastructure e.g. new schools and health centres, is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.

The application is hybrid which means that permission is sought for some of the site with full details of the remainder to follow. We understand this seeks outline planning permission for the development of the site as a whole, with specific details on house design, location of school (indicated as possible only), service roads etc... to be sought later and therefore with no guarantee that future applications under reserved matters would provide any of the promoted facilities. I urge Dacorum Borough Council to use their discretion to refuse a hybrid application.

The site is currently cultivated as Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not concrete over farmland.

	<p>The large number of dwellings will drastically and adversely change the rural setting & character of the market town of Tring.</p> <p>The increase in traffic on busy minor roads with only two access points for the entire site of 1400 dwellings and SANG visitors.</p> <p>The developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution'.</p> <p>The proposals ignore extra demand on hospital health care, already under pressure. Building a health centre, which will only serve new housing, does not alleviate demand on local hospitals.</p> <p>The developer (Harrow Estates/Redrow) only owns part of the site (that nearest to Station Road) so no commitment that the site would be developed as is outlined in this application.</p> <p>The timeframe of development over 11 years (2022-33) means long drawn out adverse impacts of construction, loss of amenity, increased demand on local resources without obligation for developer to provide infrastructure, and other associated adverse effects, especially for presently neighbouring residents and parking in town centre.</p> <p>On a final note, due to the scale of planning application documents (150 documents and 5,623 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>7 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>I object to this development. due to many reasons, the main ones being;</p> <p>The whole site is in designated Green Belt Green Belt can only be released for development in exceptional & very special circumstances.</p> <p>Despite developer's proposals to include some community infrastructure, such as 2 schools, this is not guaranteed, as this is a hybrid planning application.</p> <p>Developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution'</p>
<p>5 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>write to offer my objection to the current plan to build 1400 homes on the easter edge of Tring. I have no doubt that new homes are needed, but the scale of this build and the inorganic nature will fundamentally change the town of Tring, and there is no way of saying that this will be for the better.</p> <p>3 main points come to mind.</p> <ul style="list-style-type: none"> o The site is currently cultivated as Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not reduce it. o DBC is currently reviewing the Local Plan, following community feedback from last year's consultation, with an intention to consider brownfield urban sites

	<p>within the Borough, rather than release Green Belt It is imperative that this review should be finalised before any decisions are made on releasing Green Belt, particularly that of such a substantial nature and in such a significant location in the Chilterns and the Borough.</p> <p>o Green Belt can only be released for development in exceptional & very special circumstances, (National Planning Policy Framework 20.7.21 notably paragraphs 147-9), which these proposals fail to fulfil.</p>
<p>61 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>I object to the recent proposal for 1,400 houses to be built between Bulborne Road and Station Road east of Tring and west of the Grand Union Canal.</p> <p>Tring is a historical market town embedded in the chilterns in or on the edge of an area of outstanding area of natural beauty and surrounded by an established green belt environment embellished with ancient hedgerows within an agricultural landscape. The scale of the proposed development for housing will severely impact not only on the environment but the market town of Tring and be a blight on the countryside surrounding the town.</p> <p>I have already observed a decline in flora and fauna with the change of use of land west of the proposed site. Do we need to see more? This proposal will certainly damage the richness the area offers environmentally and to the town.</p> <p>This proposal together with the current development of Roman Park by Carla Housing north of Tring will increase the geographical footprint of Tring town in excess of 35%. The currant infrasture of amenities of public transport, schooling, health support, transport cannot support the scale of this development.</p> <p>I would like Dacorum Borough Council to seriously reconsider their decision of this proposed development and consider brown field sites in favour of green belt destruction.</p>
<p>Bryher House 16 Grove Road Tring Hertfordshire HP23 5HA</p>	<p>1. build on Greenbelt land. This planning permission is seeking to build on a site that is 100% Greenbelt land. The Greenbelt was introduced for a reason; to be a barrier between built up areas and the countryside and to ensure that this was maintained. The reasons for its introduction are still relevant today and perhaps even more relevant with the stresses of modern life. Tring is set in the Chilterns, in an Area of Outstanding Natural Beauty, and surrounded by Greenbelt land. Greenbelt is only allowed to be built on in exceptional and very special circumstances and these have not been provided to justify building on this greenbelt thereby failing the government's prerequisite requirements for permission to build on greenbelt land making this application null and void.</p> <p>Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt land is sacrificed.</p> <p>2. To build on land which has the</p>

protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.

3. To build on land which abuts the Chilterns Area of Outstanding Natural Beauty. This development will be visible from the high points of the Chilterns Area of Outstanding Natural Beauty, thereby destroying its rural and peaceful green character.

4. To build on land which is currently cultivated as Grade 2 agricultural land. Nationally we need to increase our food self-sufficiency, not concrete over farmland.

5. To build on a scale that is inappropriate to the current size of Tring. This development plus the on-going development of Roman Park increases the population of Tring by 34%. Tring is a small market town in a rural setting and a massive influx of people would drastically and adversely change the character of the town forever and this development would change the rural nature of the town's setting forever. Block developments tend to be bad for towns, in terms of changing the character of a town and this development would irreversibly change the character of this historic market town forever.

6. To take no account of the impact on the local infrastructure as there does not appear to be any thought as to whether the local infrastructure, including the road systems can cope. There has been considerable expansion of Aylesbury and with planned housing in the soon to be decommissioned RAF Halton there is already pressure on the local roads. This development is very much on the edge of the town and consequently the vast majority of needs for people living in this proposed development would involve driving and would have a massively adverse impact on the roads. Additionally, has any consideration been given to the massively increased pressure that the local infrastructure, such as, parking, water availability, sewage structure etc would be under? This plan just seems to have slotted housing on the very outer eastern edges of the town beyond the current housing boundaries with no regard for the character nor infrastructure capabilities of the town.

7. No committed infrastructure, as whilst there may be new schools and health centres in the plan these would need to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and the NHS, there is currently no commitment from these public bodies to do so. Whilst the developer states that it will contribute towards the cost of such infrastructure there is no reference to what this 'contribution' would be and therefore, it is far from fully funded. Currently Tring has one secondary and the vast majority of the children attend this school giving a sense of common purpose and a truly comprehensive schooling system and having split secondary education would undoubtedly adversely change the character of the town. Additionally,

	<p>the schools would need to be in place before any sizeable housing development takes place as all primary schools and Tring (Secondary) School are full to capacity and whilst Tring School is being rebuilt there is no additional capacity being added.</p> <p>8. To take no consideration of the extra demands on local hospital health care, which is already under extreme pressure. Building a health care centre, which will only serve new housing, does not alleviate demand on local hospitals.</p> <p>9. No provision for local jobs and services. There does not appear to be any thought as to providing local jobs and services for any proposed residents therefore adding to the pressures on the local road network as people need to commute to their places of work.</p> <p>10. A planning application for a site which is not wholly owned by the developer. The developers, Harrow Estates/Redrow, do not own the whole site so there is no commitment that the site would be developed as is outlined in the application.</p> <p>11. The application is hybrid. This means that permission is being sought for some of the site with full details of the remainder to follow. This can be interpreted as seeking outline planning permission for the development of the site as a whole, with specific details on house design, location of school (indicated as possible only), service roads etc, to be sought later.</p> <p>12. A timeframe of development of over 11 years (2022-33). This would mean a long drawn out adverse impact of construction, loss of amenity, increased demand on local resources without obligation for developer to provide infrastructure, and other associated adverse effects, especially for presently neighbouring residents.</p> <p>13. To take no account of the fact that there could be more suitable locations which are closer to the local road infrastructure of the A41 and close enough for people to walk into the town centre. I am not against housing growth for Tring, however, I believe it should be on a more proportionate scale bearing in mind the size of Tring and that any such development should be located closer to the main infrastructure of Tring. On a final note, due to the scale of the planning application document (over 140 separate documents and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond. Thank you for taking my opinions into account when considering this planning application.</p>
<p>57 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>Object because it is development on Greenbelt land, which is fundamentally wrong, it will reduce the ability of the soil to deliver ecosystem services (biodiversity, flood prevention, carbon sequestration) and damage soil health and so is contrary to the governments environmental targets and policy (Environment Bill),</p>

	<p>there is a disconnect between the proposed development and Tring, it will do little if anything to improve life for current Tring residents and there are many things that will make it worse (traffic, lack of facilities etc). Land is currently used for agriculture and so it will reduce food sustainability.</p> <p>We object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>54 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring</p>

	<p>by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>30 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>Dear Sir/Madam</p> <p>I object to this planning application to build 1,400 more houses in Tring.</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages)</p>

	<p>a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>52 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>15 Adams Way Tring Hertfordshire HP23 5DY</p>	<p>Dear Sir/Madam</p> <p>We are writing to place our objection to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of

	<p>Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>We are not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Memorial Hall The Green Aldbury Tring Hertfordshire HP23 5RR</p>	<p>Aldbury Parish Council, at its Extraordinary Parish Council meeting on Monday 25 April 2022, resolved to make the following objections to the planning application.</p> <p>1 Permission to build on Green Belt land, which is also adjacent to the Chilterns Area of Outstanding Natural Beauty, should be refused. No "Very Special Circumstances" have been put forward to justify the damage to the Green Belt. The land is also much needed grade 2 agricultural land.</p> <p>2 Development is not permitted in view of the Chilterns Beechwoods SAC Development Restrictions. The offer to provide a suitable alternative natural green space is not an adequate mitigation.</p> <p>3 It is not acceptable to build on a scale that is inappropriate to the current size of Tring. This proposed development, plus Roman Park, would increase the population of Tring by 34%, which would overwhelm the capacity of this historic market town forever. The proposed development would also have a serious impact on Aldbury Parish, in particular on the hamlet of Tring Station (the West Ward of Aldbury Parish). Difficulties of access to, and parking at, the railway station itself would be exacerbated.</p> <p>4 There is no commitment from principal authorities and the NHS to fund additional infrastructure, e.g. new schools and health centres.</p> <p>5 Dacorum Borough Council should be seeking alternative brownfield sites and should finalise the new local plan in accordance with evolving government guidelines, before Green Belt land is sacrificed. If necessary, location Tr01 should be first be considered as a more appropriate site for development.</p>
<p>15A Grove Road Tring Hertfordshire HP23 5HA</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in</p>

	<p>urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>14 Fields End Tring Hertfordshire HP23 5ER</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable</p>

	<p>location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>The White House Northfield Road Tring Hertfordshire HP23 5QW</p>	<p>I would like to register, that in my opinion the proposed scheme to build a large 1400 home residential and ancillary mixed use development on the outskirts of Tring, should be rejected.</p> <p>It seems clear, that this development is unsuitable for this location on several strong grounds, which I think outweigh any argument that there are special considerations to allow this development.</p> <p>Firstly, the site is in the Green Belt. Not only that but it is an area of Green Belt that still retains a rural character, with much wildlife to preserve. It also bounds an AONB and is midway between 2 specially designated areas of historic Chilterns beechwood, which the Council is looking to protect.</p> <p>The site is currently grade 2 agricultural land, which is flat and easily accessible for machinery. It has become clear with recent World events, that food security is becoming a priority. The site has historically flooded, thus making it a poor choice for housing, as it will affect any future inhabitants mortgage applications and insurance.</p> <p>The proposed size of the development is totally out of scale with the town. The main streets in Tring, which feed the High Street are all only wide enough for 1 car to pass at a time, due to parked cars. The High Street itself, is only just wide enough for 2 vehicles. When there is a funeral or the Postman stops, it holds up the traffic and there is a tailback. The increased population would put too much strain on the road network, let alone the bridges across the canal and railway at the Bulbourne end, only being wide enough for 1 vehicle.</p> <p>We have a large amount of nocturnal wildlife, including owls and many bats, which would be detrimentally affected by the light pollution that such a development would emit. I have regularly seen moth enthusiasts coming to the area near the Nowers as it holds such a diversity of species. Tring wants to be a sustainable and Green town and saying that suburbanising green fields and open space is equivalent to the natural environment is false.</p>
<p>1 Danvers Croft Tring Hertfordshire HP23 5LE</p>	<p>I write with objection to the above planning application:</p> <p>The area concerned is green belt and adjacent to an Area of Outstanding Natural Beauty it is also within 750 metres of the Ashridge Estate which has a moratorium on development.</p>

	<p>It includes an area of Special Conservation (Chiltern Beechwoods)</p> <p>It is grade 2 agricultural land . In a time with decreasing food security. And a need for increased UK production this will be vital in the Medium term.</p> <p>The development is out of proportion with both the population of Tring (this development would increase the population by Circa 42% . This massive increase EXCLUDES the impact on the Roman Park development to the west of Tring.</p> <p>Relevant to item 4 the town infrastructure is totally unable to cope with this level of development. The proposition for schools and or Doctors Surgery are outwith the remit of the developer's.</p> <p>This proposal ignores the current absence of a Dacorum Plan which was delayed in part because of the very considerable opposition.and in EVERY election address (all parties) described themselves as being in opposition to the original Dacorum Plan)</p> <p>If it is the intention that Tring should become a " New Town" then the appropriate consultation (including central government) should make this clear).</p> <p>I am not opposed to additional housing in Tring but this should be both gradual and proportionate</p>
<p>17 Mill Gardens Tring Hertfordshire HP23 5ES</p>	<p>Dear Sir / Madam</p> <p>I write in response to the above application.</p> <p>I wish to object to this application being approved on a number of points.</p> <p>The proposed development is way to large for a small market town like Tring.We are already having land built on to the west of the town. The very considerable amount of extra traffic would make station road and ickniel way grid locked at peak times and un bearably busy at most other times as the developer has not even been asked to upgrade any roads.</p> <p>They say they are building two new schools but what about doctors dentists and many other infrastructure that is already under great pressure in this area with out another 1;400 properties to support. We also have very few shops left to do any shopping in meaning even more travelling.</p> <p>To call it a new village ,well the clue is in the name MARSHCROFT. And how will it be a new village when it is in fact joined to Tring.</p> <p>4). The land is grade 2 agricultural land and should therefore stay as that . A lot of people walk the lane and footpaths and get a lot of pleasure from the area being by the grand union canal. The canal will probably suffer increased litter and fly tipping by having housing so close to it ,just like other built up areas close to the canal. There is lots of wildlife there , a lot of which live in damp wet ground hence its name MARSHCROFT which must be protected. This application would do nothing to protect anything just destroy it.</p> <p>5). The land is very close to AONBs and the Chiltern Woodlands, both of which are under great pressure from too many people. With Aylesbury on our doorstep and getting nearer daily with the vast</p>

	<p>amount of housing being built there I strongly wish to see the council turn this development down.</p> <p>As just stated I very much hope the council sees sense and listens to people like me . We just cannot keep developing land on this scale ,(contrary to what the PM says) . We cannot live in ever more urban areas . We need green spaces more than ever and this proposal falls seriously short on a lot of points.</p> <p>I would like to see the council use its power constructively and turn this application DOWN 100%.</p>
<p>Northfield Grange Northfield Road Tring Hertfordshire HP23 5QW</p>	<p>Dear sir/madam</p> <p>I strongly object to the Marshcroft development East of Tring application on the grounds that it is proposed to be built on greenbelt and grade 2 agricultural land. This is outrageous. It is also extremely proximate to AONB and Chilterns special area of conservation. The adverse implications for biodiversity and the wildlife are very concerning indeed. This sort of development should be built on brownfield sites.</p> <p>Ashridge is already under threat from increased visitors and now is not the time to introduce a large planning application with an increased threat to the environment. I am extremely concerned that such a huge proposal is even being considered in a such a rural area. This sort of planning should not be allowed to take place in green belt, prime agricultural land.</p>
<p>15 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>Dear Sir/Madam</p> <p>We are writing to place our objection to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed

	<p>then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>Toms Hill Estate Toms Hill Aldbury Tring Hertfordshire HP23 5SD</p>	<p>I am writing to object, in the strongest possible terms, to the planning application 22/01187/MOA proposing the construction of 1,400 new homes on the north side of Tring.</p> <p>To build housing on green belt land in an area of outstanding natural beauty would be violation of the environment and a wholesale dereliction of your duty to preserve the character of Tring as a finite market town.</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>

	<p>I would also add that nowhere have I seen that it is the intention of planners to merge towns with villages and in effect this proposed development does exactly that- encroaching on the houses around the station and over time no doubt creep towards the village of Aldbury.</p>
<p>8 Pages Croft Berkhamsted Hertfordshire HP4 1BX</p>	<p>This site is designated Green Belt land which should only be released in exceptional circumstances. Moreover the land is cultivated as grade 11 agricultural land, which should be kept as such as the UK needs to increase self-sufficiency in food. The site would be next to the Chilterns AONB and the size of the development would change the views from high points such as Ivinghoe Beacon. The site is also within the Chilterns Beechwoods Special Area of Conservation so should not be allowed to go ahead.</p> <p>The developer does not state his contribution toward building infrastructure, such as schools, medical and dental surgeries. Until a new hospital is built to serve West Herts local hospital health care will continue to be under strain.</p> <p>A development of this size would also have an adverse effect on the small market town of Tring through increased traffic.</p>
<p>11 Highfield Road Tring Hertfordshire HP23 4DX</p>	<p>I don't agree with the analysis that the majority of commuter traffic will be towards Hemel Hempstead, Berkhamsted and Aylesbury. I suspect there will be a significant amount of traffic towards Dunstable, Luton, Leighton Buzzard and Milton Keynes. This would have a major impact on the traffic using the canal and railway bridges at Bulbourne.</p> <p>I feel 1400 houses is a major step change which would be difficult to absorb into the existing town and community. There is insufficient parking in Tring for the additional vehicles.</p> <p>Having 1400 houses adjacent to Aldbury/Ashridge would devalue the beauty of these natural resources.</p> <p>Given our over reliance on imported food it would be a better strategy to keep the land as agricultural rather than housing.</p>
<p>4 Nursery Gardens Tring Hertfordshire HP23 5HZ</p>	<ol style="list-style-type: none"> 1. Building on green belt land adjacent to an Area of Outstanding Natural Beauty should only be undertaken in exceptional circumstances. These circumstances have not been justified in the proposal. 2. Dacorum Borough Council's review of the availability of brownfield sites has not been completed, and any new planning application proposing to build on greenbelt land should be postponed until the review has been completed. 3. The development is excessive in scale and is inappropriate to Tring's current size, particularly considering the current development at Roman Park. 4. There is a more appropriate location for a development at TR01. <p>I do not oppose all housing growth for Tring, but it should be in a</p>

	location and at a scale appropriate to to the area.
<p>1 Grove Leys Grove Road Tring Hertfordshire HP23 5PB</p>	<p>Response to Planning Application for Land East of Tring.</p> <ol style="list-style-type: none"> 1. As many people are now able to work from home, are these new houses really needed? Why buy an expensive property in Tring when there are much cheaper homes available elsewhere? There has been a well-documented demographic shift to more affordable rural areas. 2. The Government's stated policy of levelling up and developing industry, commerce etc., in the Midlands and North, surely obviates the need for increased general housing in this locality. BUT see 3 below 3. This development provides the wrong type of private residential properties, which will produce huge profits for the Construction Company and landowners subject to section 106 or its replacement - see below. What Tring really requires to thrive, as an inclusive community, is more affordable housing for key workers and young people, developed by a Housing Association/shared ownership or other in conjunction with the Council. What provision is being made under Section 106 and its proposed replacement? 4. It will change the whole character of an historic market town. The sheer size of the proposed development will alter the whole environment from a homogeneous town, centered around the High Street, to an urban area split in two. 5. It will be a blot on the landscape in an area of outstanding natural beauty and damage the ecology of the area. 6. Marshcroft Lane is an important amenity for the people of Tring - a very popular walk, providing rural peace and charm, and leads to further footpaths along the canal and to Aldbury Nowers. Its value was highlighted during the Covid lockdown, when it proved essential for physical and mental health and wellbeing. Increased traffic along a narrow, one-laned road will render the Lane unusable for walkers. Coupled with the lack of view of the countryside this will render it useless 7. Though shops are planned for the proposed development, if these follow the usual pattern of suburban shops, they are likely only to sell daily essentials at a higher price than High Street stores. Therefore, it will increase the pressure on the existing car parks in the High Street, which are barely adequate at present, as new residents will wish to access cafes, restaurants, dentists, doctors, opticians, ironmongers, the weekly market etc. 8. Despite the by-pass, traffic in Tring High Street is problematic. Jams are frequent as delivery vans block the road and buses and lorries have difficulty in passing one another. Drivers from this proposed development will inevitably exacerbate the problem. 9. If a new secondary and primary school are built, this will increase traffic throughout the town (with its associated problems), as pupils will not be confined to the new development. At the beginning and end of the school day, traffic will be considerably increased throughout Tring. Moreover, from where will they get the teachers? 10. Building 1,400 dwellings is excessive. The new Roman Park development has provided a great number of extra houses in the area and many of these are still for sale. The full impact of these on local facilities on the station carpark, given they are at the "wrong end" of town is yet unknown. 11. As there are few "executive "jobs in the area, the proposed

	<p>development will be mainly inhabited by commuters, albeit some part-time, as working from home seems to be an increasing pattern. This development merely adds to the suburban sprawl which is plaguing the area. The expansion of Aylesbury eastwards, which is fast approaching the engulfment of Aston Clinton, should alert Dacorum Planning Authorities to the detrimental effects of large developments altering the characteristics of a town.</p> <p>12. Tring simply does not have the facilities or infrastructure to cope with an extra population of what will be at least 3,000 people. The proposed development includes very limited facilities. Additional pressure will be put on doctors, dentists, childcare, station parking and council services (for which the Planning Application makes no provision).</p> <p>13. What are the section 106 proposals other than the absolute minimum which seems to be included here? And, if it comes to being a development levy, what amount will recompense Tring for the loss of amenity that this proposal will incur? Please reject this proposal outright.</p>
<p>11 Highfield Road Tring Hertfordshire HP23 4DX</p>	<p>We object to further loss of Green Belt Land. The Green Belt is there to preserve the identity of separate developments. Bleeding Tring into the hamlets of Bulbourne and Tring Station does not deliver a "sustainable community that will seamlessly integrate with Tring" (Summary Guide, para 3.1).</p> <p>The threat of such parasitic overdevelopment must also be repelled due to its damage to Tring's relationship with nearby Areas of Outstanding Natural Beauty (AONB) and the Chilterns Beechwoods Special Area of Conservation (SAC). The plan's provision of Suitable Alternative Natural Green Space (SANG) will not protect the beechwoods from further damaging recreational pressure, as people will not confine themselves to this development.</p> <p>Were this Grade 2 agricultural land to be lost, more of our food security would be gone forever.</p> <p>The roads north and south of the development are single carriageway with congestion and access difficulties which would worsen with extra traffic. Travelling to nearby towns from the north of the planned development for employment, and elsewhere for leisure, is already problematic with a traffic light controlled bridge over the railway and a narrow canal bridge on Icknield Way.</p> <p>It is the county council which provides schools. A development of 1400 dwellings could not support a new secondary school - that land would be used to further inflate the population.</p> <p>The impact of over 200 homes to the west of our pressurized Tring has yet to be felt fully. The infrastructure is already at breaking point e.g.:</p> <ol style="list-style-type: none"> 1. The main doctor's surgery has a tiny carpark and barely copes. 2. Brook Street is barely passable. 3. Tring Station carpark (pre-Covid) was full before 8am, causing people to drive to other stations on the line to Euston. 4. Tring's car parks can hardly cope.

	<p>5. Tesco seems to be trading to capacity. 6. The narrow High Street's pavements are cramped.</p> <p>Save our Tring.</p>
<p>19 Longfield Gardens Tring Hertfordshire HP23 4DN</p>	<p>It is self evident that a development of this scale in context of the locality which is already stretched for infrastructure, roads, amenities, health etc is totally inappropriate and should be massively scaled down or rejected.</p>
<p>2 Sinfield Place Grove Road Tring Hertfordshire HP23 5FE</p>	<p>I could list all the reasons not for this planning to go ahead like the other comments (I agree with them all) but hand on heart you know this development is completely wrong for Tring!!!</p> <p>The land is green belt and green belt was put in place for a reason! Never should it be built on.</p> <p>It is a place which I walk weekly (and with my children) and for it to turn in to a concrete jungle is devastating. For physical and mental health our countryside should stay countryside! Once it's gone it will never be countryside again and that is heartbreaking.</p> <p>The last 2 years has proven that we need our countryside more than ever! When we couldn't do anything 'normal' we could still walk in our countryside. Those memories of our lockdown walks will last with me forever as my children were happy, carefree and outdoors in fresh air.</p> <p>Please do the right thing and reject this planning application.</p>
<p>6 Albany Terrace Grove Road Tring Hertfordshire HP23 5HP</p>	<p>I am writing this to inform you that I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring

	<p>when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>6. The development builds upon an area with an abundance of Wildlife. Bats, hedgehogs - both of which are a protected, endangered species, we are meant to be protecting.</p> <p>7. These types of areas offer us great defences against flooding, and climate change. The more trees, fields we have, the better flooding protection.</p> <p>8. The area offers beautiful walks for the local people of Tring. This is hugely important for peoples health, and mental health.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>Appleby Wharf Lane Northchurch Berkhamsted Hertfordshire HP4 3TG</p>	<p>Overall, DBC needs to revise its Local Plan to take account of all the issues raised in the consultation before any such major development is considered.</p> <p>Local Councillors realized finally how important it was to review the changing needs of the area in the light of changing work practices post pandemic. Also the high value local residents place on protecting the Green Belt. I understand that work is underway to look at urban and brownfield sites before sacrificing any further Green Belt land. This proposal takes a significant area of Green Belt land next to an AONB and should therefore be rejected at this stage.</p> <p>I believe there was a recent decision to halt all development on the Chiltern Beechwood's SAC near Ashridge and Tring. I believe this is another reason that this application should not proceed.</p> <p>The size of the proposed development is completely out of proportion with Tring taken with the existing development at Roman Park. It would ruin the essential nature of this attractive market town.</p> <p>There is insufficient infrastructure in this community to service such an increase in population. Developers depend on HCC and the NHS to provide these and that is by no means guaranteed.</p> <p>Please revise the Local Plan and allow the moderate additional housing in Tring to meet local need without sacrificing Green Belt land.</p>
<p>11 Mortimer Hill Tring Hertfordshire HP23 5JT</p>	<p>We very strongly object to the planning application (22/01187/MOA) for the following reasons:</p> <ul style="list-style-type: none"> - Building on a site which is in entirety designated as green belt land which is also adjacent to the Area of Outstanding Natural Beauty is a tantamount to ecological vandalism. Green Belt can only be released for development in exceptional & very special circumstances. These proposals fail to demonstrate exceptional circumstances (see National Planning Policy Framework revised 20.7.21 in particular paragraphs 147-9). Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to

	<p>build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. Local Planning Authorities have complete discretion on whether or not to accept a hybrid application. We urge DBC not to accept this.</p> <ul style="list-style-type: none"> - The proposed site has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation) March 2022. This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. This protection is key if we to prevent any further impacts upon those estates. - The site is currently cultivated as Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not concrete over farmland - The development is on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. - Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. Developers proposals of additional schools and health centres are not at all guaranteed, as this is a hybrid planning application. Proposals ignore extra demand on hospital health care, already under pressure. - Developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution' - To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. In particular, the proposed land for development on Marshcroft lane is so close to the AONB that the disputation cause by the 11 years of development would have a significantly greater impact on the nature and biodiversity of not just the surrounding green belt but also the AONB - I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). - On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .
<p>94 Dundale Road Tring Hertfordshire HP23 5BZ</p>	<p>With the recent and ongoing large housing development at the other end side of Tring (top of Icknield Way), this further over development of green belt land will absolutely ruin the charatcer of our once small market town. On top of thid other development it's completely disporportionate to any population increase. There is not enough parking in town currently due to the recent developments expanding Tring. Places at surgeries, dental surgeries and schools are already like gold dust and waiting times are getting ever longer. The only major supermarket in Tring which also serves the surrounding villages cannot cope with the number of shoppers it has presently and simply</p>

	<p>put Tring is just too small to take in yet more families. Overdevelopment has already had a tangible detrimental impact on the current lives of residents in Tring and the services that we receive. As we've all had a raise in Council Taxes to pay for a poorer quality of service it is objectionable that this proposal is even being considered.</p>
<p>21 Bunyan Close Tring Hertfordshire HP23 5PS</p>	<p>This plan is just ludicrous - 1400 houses in greenbelt. What about the wildlife, the greenspace, the fact that this area is used by hundreds of local people to walk, run, cycle and enjoy the countryside without any need to get into their cars.</p> <p>We are being urged to protect the environment, reduce our carbon footprint and for Britain to use our own agricultural land yet this plan is being considered and it goes against all of these.</p> <p>The hedgerows will be destroyed just like at the other end of Tring. Hasn't Tring already taken far more than their share of housing?</p> <p>I urge our planners to see sense and reject these plans before we completely ruin the lovely town of Tring and the countryside around it, please do not bow down to the developers who will just make their money and move on!!</p>
<p>Grove Fields Residents Association Tring HP23 5PJ</p>	<p>I am the Chairman of the Grove Fields Residents Association (GFRA). The GFRA objects to the planning application (22/01187/MOA), the GFRA objection is on behalf of our 572 members who are all residents of the local area. The GFRA objects to this planning application because it proposes:</p> <p>1) To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2) To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3) To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4) Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5) To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>31 Friars Walk Tring Hertfordshire HP23 4AP</p>	<p>I strongly object to this proposal. In the wider context of a worldwide climate emergency it is extremely important not to build on green belt land with all the effects on the environment, flora and fauna that this would entail.</p> <p>The green belt land is very close to areas of outstanding natural beauty and exceptional circumstances have not been shown to justify building on it.</p> <p>The land has the protection of the Chilterns Beechwoods SAC and this protection should be observed rather than the area being built on. The outcome of the previous local plan consultation showed that an increase in population in Tring would have adverse effects on the Ashridge estate and Tring Woodland. These should be preserved for current and future generations, not ruined or destroyed.</p> <p>The scale of the building is totally inappropriate to the current size of Tring and the need for the number of houses has not been shown. As it would be on top of the current Roman Park development, together they would increase the population by 34%. This would both change the character of this historic town forever and totally overwhelm the current infrastructure capacity. This includes local health and education facilities as well as the major impact of more cars and pollution. It is unrealistic in the extreme to think that new occupants would not use cars, particularly in the absence of a good local bus service.</p> <p>Tring is a small market town with a wonderful friendly character. It would be ruined by such a massive increase in population and detract from the quality of life of those living here.</p> <p>Although additional infrastructure of schools and health centres are mentioned these are to be provided by local authorities and the NHS and there is currently no commitment from these public bodies to do so. In current economic climate it is unlikely, in my view, that funding will be readily available.</p> <p>Finally the length of time given to read and digest the planning application documents (over 140 and 5,500 pages) was very short and more time should be given to the public to review and respond to them.</p>
<p>19 Elm Tree Walk Tring Hertfordshire HP23 5EB</p>	<p>I object to this proposal.</p> <p>This in an overdevelopment Destroy natural habitats, including hedgerows a nationally threatened habitat and route way.</p>

	<p>Changing small market town character. Towns infrastructure already under strain will not cope. Roads are in poor condition, schools oversubscribed and waiting time/inability to access local health care. Will only be made worse by additional population from this development. These proposed improvements to Tring's infrastructure are not guaranteed or financed by the developers - it will be up to local authorities to provide.</p> <p>Already had development to West of town Roman Park, no new school was built although was in the original plans. Would expect the same here, the land set aside for schools, would eventually become extra house.</p> <p>Deterioration in quality of life for many residents of Tring. Pressure on services and amenities and also disruption, noise and air pollution throughout the many years of construction.</p> <p>Quite simply this development is UNSUSTAINABLE, it will not meet the needs of Tring's population today nor the needs of future generations.</p> <p>It is a greenfield site surrounded by an area of Natural Beauty, brownfield sites in towns e.g. Watford and Hemel should be redeveloped to meet the additional housing needs in the area. Not changing Tring from a small town into one with a population increased by 40%.</p> <p>I object to this proposal.</p>
<p>1 Astley Place Station Road Tring Station Tring Hertfordshire HP23 5QX</p>	<p>I object to the planned Marshcroft development for the following reasons;</p> <p>1. Building on green belt land in close proximity to the AONB. Green belt land is precious and any building/development should only be undertaken as a last resort. The pandemic gave everyone a much stronger appreciation of the value of wild countryside and open space and this should be available for the enjoyment not just of residents but of the many people who choose to visit every year for recreation. This will be lost with a development of this size and nature and there are far more suitable areas for development to take place on brown belt land or in already urban areas. Building on the green belt will detrimentally affect the AONB, and is likely to lead to further development of this land, which completely undermines the designation of land as green belt/AONB in the first place.</p> <p>With so much focus on sustainability and environment, it does not make any sense at all to sacrifice yet more green belt land to building, especially when it is not clear that inner city/town office buildings will ever be utilised in the same way again, creating an opportunity for new housing in existing built-up areas close to existing facilities and particularly suitable for the young and elderly people for whom suitable housing is most needed.</p> <p>2. There is no plan to fund the planned facilities such as schools, leisure facilities and doctors surgeries described in the plan. These facilities would only be required due to the size of the development and are not of any benefit at all to existing residents. Current residents of Tring and the surrounding area value the countryside and open</p>

	<p>space and do not choose to live in the area for 'facilities' which can be found in existing urban towns, if needed. Furthermore, the plans for 'open space' within the development, which is presented as a positive, completely fail to take into account that the area at present is entirely an open space, perfect for dog-walking and recreation and so there is no requirement whatsoever for 'open space facilities'.</p> <p>3. The size of the development is out of all proportion to the size of Tring, and would be to the detriment of local communities, damaging the character of the area and putting an unacceptable strain on infrastructure including traffic and parking, and increasing the flood risk for both new and existing residents. Even with the existing transport links it is inevitable that residents will use cars to get around and this must be taken into account to reflect the reality of modern life, rather than what we might wish it to be!</p> <p>4. Such a huge development must be considered alongside a plan for the county/country. There is a reason why Dacorum rejected this area for development in the local plan and this should be respected in the current decision-making process.</p>
<p>67 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>Please note that I have the following objections to the 'Marshcroft Garden Suburb' proposed development.</p> <p>The building is proposed on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. No exceptional circumstances have been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be completed, and the new local plan should be finalised before any plans like this are considered.</p> <p>Building on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation) is proposed. This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>This plan is to build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and proper planning put in place so that it does not have an adverse effect on the town.</p>
<p>2 Grove Leys Grove Road Tring Hertfordshire HP23 5PB</p>	<p>Dear Sirs / Madam,</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in</p>

	<p>urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>I have lived in or around Tring for the past 28 years and have witnessed the rapid development of the town. I believe any further expansion of Tring will require significant investment in its infrastructure (e.g. Schools, Medical Services, Roads etc.). I object to this specific planning application based on the above points. However, I also object to any further expansion of Tring unless there is a clear and unambiguous investment plan that is aligned to the planning application.</p>
<p>9 Malting Lane Aldbury Tring Hertfordshire HP23 5RH</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. The proposed land for the development is cultivated as high quality Grade 2 agricultural land, adjoining and informing the setting of the Chilterns AONB. Recent experience consequent upon the conflict in Ukraine has emphasised the importance of the UK sustaining agricultural land for future needs when supplies from other countries may be compromised.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. The development will be visible from the high points of the AONB, such as Ivinghoe Beacon, thus destroying its rural and peaceful green character</p> <p>3. To build on a scale that is inappropriate to the current size of Tring. The proposed Marshcroft development and the in-progress Roman Park estate will increase the population of Tring by an estimated 34%.</p>

	<p>Such an increase will severely test an already overloaded existing infrastructure, any additional infrastructure notwithstanding. Thus, the character of Tring as a historic market town will be irreparably damaged and changed forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres. Such infrastructure is to be provided by Hertfordshire County Council, Dacorum Borough Council and the National Health Service. Each of these bodies are, and will be for the foreseeable future, subject to significant financial pressures. None of the named bodies have yet committed to providing additional infrastructure. Further, the proposal ignores the consequent additional demand on hospital health care, already under pressure. Building a health centre, which will only serve new housing, does not alleviate demand on local hospitals.</p> <p>Additionally,</p> <p>1. The proposal does not address the time scale of the development between 2022 and 2033) and the consequent adverse impacts (e.g. construction and associated traffic; loss of amenity; increased demand on local resources). There is no acknowledgement of developer obligations to address the adverse impacts, particularly those affecting neighbouring residents.</p> <p>2. Throughout the development time scale and thereafter, there are two traffic pinch points in close proximity to the site; the Station Road bridge over the Grand Union Canal and the railway bridge adjacent to Tring Station. Whatever measures are taken to mitigate the increase in traffic at these locations (e.g. alternate flow traffic lights, and strengthened bridge structures), the impact of heavy construction vehicles and other traffic is likely to be significant.</p>
<p>27 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>I object to the proposed development on the following grounds:</p> <ol style="list-style-type: none"> 1. The scale of the development is enormous compared to the current size of Tring. It will completely alter the character of the market town. 2. The current infrastructure cannot support 1400 new homes (and by default thousands more people). This proposed development, together with the recent one at Roman Park, will increase the population of Tring by 34%. 3. The proposed development is entirely on Greenbelt land. 4. Brownfield sites should be considered first. 5. The opportunistic timing of the application while the revised Local Plan has yet to be agreed and published. 6. Dacorum Borough Council are currently reviewing the availability of Brownfield sites in urban areas to minimise the need to build on the Greenbelt - this review should be allowed to complete, and the new Local Plan should be finished before any Greenbelt is sacrificed. 7. The proposed major development is adjacent to the Chilterns AONB. 8. The area, being undeveloped land, is currently unlit and does not suffer from light pollution that could adversely affect wildlife. 9. The impact on the Chilterns Beechwoods SAC (i.e. Ashridge and Tring Woods specifically) needs proper attention and mitigation, endorsed by Natural England to satisfy the legal requirements of a

	Habitats Regulations Assessment.
East View 25 Grove Road Tring Hertfordshire HP23 5HA	<p>We strongly object to this application due to.</p> <ol style="list-style-type: none"> 1. Green Belt Land - should be protected in line with original green belt aims to prevent urban sprawl. Arguably the area east of Tring is the first large area of green space west of London. 2. AONB - Tring is the Gateway Town to the Chilterns AONB, the site is overlooked by some of the finest wild life sites in Herts. 3. Dacorum Development Plan - A new local plan is proposed, to be submitted in October 2025, with a further public consultation to be held in June 2023. No ad hoc decisions should be taken before this date. 4. Local Infrastructure - Tring is a small market town, the facilities offered can only accommodate the needs of the present population. In particular medical facilities and reliance on hospitals outside the area already coping with the needs of large towns. Additionally the road infrastructure giving access to the site is inadequate, both Bulbourne Road and Station Road/Cow Lane already carry large volumes of traffic accessing the A41 and onward to the M25. 5. Tring Character - Tring has a unique character and architectural style, this should not be put at risk by being overwhelmed by the current excessive building schemes. 6. Environmental impact - As already mentioned this is green belt land and should not be lost to such a development. The impact of such a large built up area on the local wild life and the pollution caused by so many vehicles accessing the site both during construction and when occupied, is immeasurable. 7. We suggest you take a walk, with the Tring Town Council members, along the Ridgeway Path at Aldbury Nowers to visualise the impact such a development would have on Tring and the surrounding area!
58 Wingrave Road Tring Hertfordshire HP23 5HE	<p>I object strongly to this application as it is building on green belt land which is next to a area of outstanding natural beauty.</p> <p>The size and scale of this development is inappropriate to the size of Tring along with the Roman park development it will increase the size of the population by 34% which will spoil the character and infrastructure of tring .</p> <p>I know housing is needed but should be within keeping of the area and other brown sites could be utilised first.nearer to the town .</p> <p>I do hope that as a council that you give this a lot of consideration and think about the residents of Tring .</p>
9 Grove Road Tring Hertfordshire HP23 5HA	<p>I object to the planning application (22/01187/MOA) for the reasons set out by all the other comments, but also due to the fact there are so many brownfied sites locally that could be proposed for any such development or certainly sites that are not so agriculturally viable. These fields are harvested every year and with world supply diminishing due to conflict and cost we need to maintain local supply.</p> <p>I object to the planning application (22/01187/MOA) for the reasons set out by all the other comments, but also due to the fact there are so many brownfied sites locally that could be proposed for any such development or certainly sites that are not so agriculturally viable.</p>

	<p>These fields are harvested every year and with world supply diminishing due to conflict and cost we need to maintain local supply. I object to the planning application (22/01187/MOA) for the reasons set out by all the other comments, but also due to the fact there are so many brownfied sites locally that could be proposed for any such development or certainly sites that are not so agriculturally viable. These fields are harvested every year and with world supply diminishing due to conflict and cost we need to maintain local supply.</p>
<p>64 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>7 Albany Terrace Grove Road Tring Hertfordshire HP23 5HP</p>	<p>I object to planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to an Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to be completed, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on green belt land which has the protection of the Chilterns Beechwoods SAC (Special Area of

	<p>Conservation), provides protection to the green belt near the Ashridge Estate and Tring Woodland which the proposal plans to develop houses upon.</p> <p>3. To build on a scale of this size is inappropriate to the current size of Tring ie this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure, eg new schools and health centres, stated to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS. There is currently no commitment from these public bodies to do so.</p> <p>5. It seems pointless to build on a Green Belt location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring which is within a location which minimises an impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure, ie the High Street and A41.</p> <p>On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>49 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>My comments are as follows: Such a large development with plans to build such a large set of housing simply cannot be structured into the current road network of the surrounding area. Even with the proposed additions to the network, the influx of traffic will add to the already strained infrastructure in Tring. The noise pollution of the added traffic will add strain to residential roads, adding busy traffic sections to roads that simply were not designed for such a large volume of traffic.</p> <p>I have concerns over the ecological impact this will have on the surrounding green areas, with an impact on flooding and drainage in local areas. An increasing loss of hedgerows and native species in the area will highlight the loss of the ever-shrinking greenbelt and the surrounding areas of the Tring area.</p>
<p>1 Fantail Lane Tring Hertfordshire HP23 4EN</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring</p>

	<p>Woodland which the proposal is planning to develop houses upon. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>29 Kingsley Walk Tring Hertfordshire HP23 5DN</p>	<p>Dear sir or madam</p> <p>I wish to strongly object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides legal protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides legal protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>19 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>We strongly and wholeheartedly OBJECT to this proposal because it proposes:</p> <p>- To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Brownfield sites should always be prioritised in the first instance. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should</p>

	<p>be finalised before any green belt is sacrificed.</p> <ul style="list-style-type: none"> - To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. - To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. - Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. - Put simply, green spaces like these are vital for the wellbeing of local residents and wildlife. - On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.
<p>Ivy Todd Northchurch Common Berkhamsted Hertfordshire HP4 1LR</p>	<p>This is Green Belt/AONB Land and should therefore be protected areas. DBC have declared a climate and ecological emergency and these proposals which would have an extremely detrimental effect on our Chiltern countryside, its AONB and the market town of Tring.</p>
<p>43 lower ickniel way Marsworth Hp23 4ln</p>	<p>I write to strongly object to this proposal. It is get too many houses on greenbelt. I do not fit one minute believe in the schools being built as I have seen this countless times in other similar proposals and nothing has happened. Far too big a project which will change the character of Tring forever.</p>
<p>36 Chiltern Way Tring Hertfordshire HP23 5LD</p>	<p>I have lived in Chiltern Way in Tring for more than 10 years. From experience of the ability of the present area and its facilities to cope with the present population without failing, I make the following comments about this proposal: The scheme would build on beautiful 'green belt' land, when this action has not been justified. Building on this area of land is protected, which this scheme appears to just ignore. The sale of building is far from reasonable for a single new development in this area and is inappropriate. With no new schools, doctors' surgeries, hospitals, police and fire authorities planned for this area, in conjunction with the development, the proposal seems irresponsible. My family and myself are well aware of the need for additional housing, but this needs to be built in a well considered manner and discussed and agreed with Planners, not pushed into a great money-making exercise by a developer on an unsuitable area to spoil and overload the town of Tring.</p>

<p>5 Queen Street Tring Hertfordshire HP23 6BQ</p>	<p>This application seems like a logical next step for a mid sized market town like Tring.</p> <p>1/If you are a young family with a desire to settle here you are currently unable to purchase a property (cost and supply issues)</p> <p>2/ If you are looking to live close enough to walk or cycle to the train station you are constrained by the availability of housing in the Grove area</p> <p>3/ Tring Town needs more footfall for the local businesses to be viable (we have a number of vacant shops in the High st and this will get worse without an economic injection like 1400 houses)</p> <p>4/ Tring School has extra capacity built in and to my understanding our Primary schools have never been full in the last 20 years</p> <p>5/ The extra schools and sports facilities are most welcome.</p>
<p>1 Fog Cottages Tring Station Tring Hertfordshire HP23 5QP</p>	<p>I wish to register my objection to Planning application 22/01187/MOA for the following reasons:</p> <p>1. It proposes to build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to be completed, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. It is a, hybrid application, therefore without detail for the whole of the proposed site and as such, in the current circumstances where the new strategic plan is not yet completed, should be rejected until such time as the plan is ready. It is too large a proposed development to be allowed to slip through.</p> <p>3. It proposes to build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to a zone of influence within a 12.6km radius of the Ashridge Estate and Tring Woodland, directly within which this proposal is planning a very large scale development. It proposes to build on a site that is currently cultivated as Grade 2 agricultural land - nationally it has become evident, we need to increase our food self-sufficiency, not concrete over farmland It proposes a large development which would be visible from the high points of the AONB, such as Ivinghoe Beacon, and Ashridge thus destroying its rural and peaceful green character</p> <p>6. It proposes to build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park would increase the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>7. Additional infrastructure e.g. new schools and health centres, are proposed to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from</p>

these public bodies to do so. Current provision for Schools, hospitals and GPs and supporting care is already overstretched and professionals to support increased demand in the area are, and will be, in very short supply.

8. Water and sewage supply and services are already under strain in this area and this huge increased demand is likely to exacerbate both to the detriment of current residents. Thames water are more and more frequently called out to attend sewage problems and water pressure issues already. Also broadband/electricity supplies - no mention of how they will address this in an ecological way and to not add further strain to local services.

9. There is no commitment from HCC or any transport body to provide public transport of any kind for the residents of this proposed development. Tring Station car park is very expensive and was already unable to fulfil pre-lockdown demand. Usage is building steadily again but it would be most likely that people would be dropped off rather than park at the station increasing the already hazardous road and pedestrian conditions at morning and evening peaks.

10. Station Rd is already a very busy road with current levels of usage. Adding likely over 1,000 additional household vehicles and new road access to the development would be completely inappropriate for a 2 lane road in this location causing severe additional safety hazards and congestion. Bulborne road is already very constrained by the signalled one way bridge so is obviously not an appropriate access road.

11. Building on this location would essentially join the main town of Tring to the tiny hamlet of Tring Station. This has always been stated as something that should be avoided in rural town developments.

12. There is also just one reasonably sized (Tesco) supermarket in the area which services all the small villages as well as many from Berkhamsted. There is no space with suitable access to locate additional large stores within the surrounds of Tring town so service an additional 1,000 or more households.

13. It proposes to build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.

I am not averse to housing growth for Tring, however, however I believe it should be more proportionate to the size of Tring, and a good percentage of properties priced in keeping with average local household incomes, not average value of the housing stock in the area. It should also be located closer to the main infrastructure (High Street and A41).

I only found out about this application by word of mouth which is very poor for a proposal of this size to be located less than a mile from where I live and particularly given the very short time allowed for responding, shortened by the application having been submitted prior to a long holiday weekend. In addition, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review,

	digest and respond.
<p>32 Station Road Tring Hertfordshire HP23 5NW</p>	<p>I wish to object to the planning application 22/01187/MOA because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>I am against so much housing growth for Tring, as I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>4 Nursery Gardens Tring Hertfordshire HP23 5HZ</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is

	<p>inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>32 Morefields Tring Hertfordshire HP23 5EU</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>Beech Cottage Fox Road Wigginton Tring Hertfordshire HP23 6EE</p>	<p>Dear Sir,</p> <p>I am writing to register my opposition to the above planning application for the following reasons:</p> <p>The scale of the proposal is completely out of proportion and will put severe pressure on the current infrastructure of the town. Already there is an increase in the amount of traffic and pollution and lack of adequate facilities.</p> <p>Green belt land should be preserved at all costs and alternative brown land should be used first. Green and open spaces are essential for well being and people who live in the area should not have their pleasure in the environment and their surroundings compromised.</p> <p>Another point that I would like to draw to your attention is the short time limit in which people can respond to the proposal. I think it is disingenuous for the Council to make such a short deadline, given the complexity of the proposal, as it does not allow for proper consultation and discussion.</p>
<p>10 Grove Gardens Tring Hertfordshire HP23 5PX</p>	<p>I am writing to object to planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed</p>

	<p>then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>The run off of water with added phosphates and Nitrates that will no doubt enter the local watercourse will always be a problem.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>The Copper House 30 New Mill Terrace Tring Hertfordshire HP23 5ET</p>	<p>We have recently been made aware of planning application (22/01187/MOA). We object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. Given that the name Tring is believed to derive from the Old English Tredunga or Trehangr, 'Tre' meaning tree and 'ing' implying a slope where trees grow we believe it's important to protect the green spaces and trees of the area. (Source https://en.wikipedia.org/wiki/Tring) 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>We are not against housing growth for Tring, however, we believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for</p>

	the public to review, digest and respond.
<p>The Granary Marshcroft Lane Tring Hertfordshire HP23 5QN</p>	<p>Dear Sir/Madam We object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. 5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. <p>We am not against housing growth for Tring, however, we believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>1 Fantail Lane Tring Hertfordshire HP23 4EN</p>	<p>Dear Sir/Madam</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning

	<p>to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>66 Grove Road Tring HP23 5PD</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p>

	<p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>Hillview 45 Stock Road Aldbury HP23 5RT</p>	<p>Dear Sirs / Madam,</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. 4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. <p>I have lived in or around Tring for the past 28 years and have witnessed the rapid development of the town. I believe any further expansion of Tring will require significant investment in its infrastructure (e.g. Schools, Medical Services, Roads etc.). I object to this specific planning application based on the above points. However, I also object to any further expansion of Tring unless there is a clear and unambiguous investment plan that is aligned to the planning application.</p>
<p>33 Stoneycroft Aldbury Tring Hertfordshire HP23 5RP</p>	<p>To whom it may concern</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p>

	<p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond ."</p>
<p>The Grove House 63 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should</p>

	<p>be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond</p>
<p>1 The Beeches Tring Hertfordshire HP23 5NP</p>	<p>Totally agree with all the other comments, so I won't repeat myself. This development will ruin and spoil what Tring is all about. Wildlife, trees, Green belt, open spaces, peace, quiet and tranquility. Many open, long lovely walks on and around the canal . Tring has so much character and is known for its beauty and visited by many. Station road is and can be a busy road. It's currently very bumpy and not maintained. This will only get worse.</p> <p>It's a place I often run/walk with the dogs and we love it. It's great for our health both physically and mentally. One of the many reasons we chose to move here. I often hear friends and others say how beautiful Tring is and how much they love visiting. Please let's not ruin this by over building and populating, especially In this area.</p> <p>There surely has been enough new homes in Tring already. Can another area be considered.</p> <p>For the new homes recently built where is the new infrastructure, health centres, schools, new roads. Old roads being maintained.</p>
<p>57 Wingrave Road Tring Hertfordshire HP23 5HE</p>	<p>Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation) is unacceptable. This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41) and should not be on green belt land.</p> <p>Due to the scale of planning application documents a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>

<p>6 Nursery Gardens Tring Hertfordshire HP23 5HZ</p>	<p>We strongly object to this planning application. Any proposals on this scale on green belt land should not be considered before the availability of brownfield sites has been assessed and before the local plan has been finalised. Tring enjoys a unique setting adjacent to the Chilterns AONB and Beechwoods SAC. This offers protection to green belt land near the Ashridge Estate and Tring woodland. We consider this proposal totally out of proportion for a town of Tring's size offering little in the way of additional guaranteed infrastructure. Any suggestion that the proposed new garden suburb (suburb: an outlying district of a city) will "protect and enhance (the) existing landscape....to increase biodiversity" and "....enhance environmental sustainability to tackle climate change" is complete greenwashing.</p>
<p>Copper Beech 46 Grove Road Tring Hertfordshire HP23 5PD</p>	<p>I object to the planning application for a number of reasons:</p> <ul style="list-style-type: none"> - It is an extensive development on green belt land which cannot be justified. - There is no consideration for the existing trees, hedgerows and wildlife on the site. - The scale is extremely excessive and inappropriate given the current size of Tring. - There is not the infrastructure to support the additional population. The local schools are already under pressure with the existing housing on the other side of Tring and a school needs to be built on the other side of Tring so that children can attend without driving across town. There's no suitable supermarket - I'm concerned about the roads and access to the site as they are not suitable for the existing traffic. There is no decent route to the A41 for a development of this size - the existing route via Cow Lane would not be suitable as there is already a significant issue on this route when junior training is on at the rugby and football clubs (which results in kids walking on the road while there are still cars driving fast down the thin road - it is already an accident waiting to happen). - There is no consideration for where the excess water will go given that the area already floods in heavy rain - There's no consideration for the other issues already in Tring (such as the parking issues along Cow Lane) <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring, located closer to the main infrastructure (High Street and A41) and be a part of the overall planning for the town (rather than this significant stand alone request).</p>
<p>65 Dundale Road Tring Hertfordshire HP23 5BX</p>	<p>Central Tring itself has a very poor road layout, based originally on Victorian road layouts and lanes. Traffic chaos often occurs if a delivery takes place anywhere in Tring High Street at peak times due to its very narrow width. The roads which link to central Tring (eg Frogmore Street, Miswell Lane, Brook Street, Akeman Street) all have very narrow sections which rely on drivers giving way and are effectively one way traffic. Central Tring cannot cope with a significant increase in Traffic. There is no scope to widen or improve the traffic flows unless substantial one way systems were to be introduced, and very widescale restrictions on car parking on the roads in a Victorian</p>

	<p>town which has no scope for parking elsewhere for the residents. Station Road is a busy route to the station which floods whenever it rains. This has never been sorted out, and the whole area gets waterlogged relatively easily. The extensive disruption caused by the proposed development will cause chaos, especially given the need to cut through the only pedestrian and cycle route between Tring Town and Tring Station, which can get very busy.</p> <p>There are better sites closer to Tring, and closer to the bypass (TR01 ?), where the extensive construction traffic can be kept away from the currently congested and at times dangerous roads around Tring and access the bypass relatively easily.</p> <p>Pre-Covid, Tring Station Car Park was often overflowing. It was often not possible to park there on weekdays after mid morning. More homes would mean more commuters from Tring and hence the car park would become full much earlier, so a solution to this is fundamental to any development going ahead. However, the station car park is in an AONB, so cannot just be expanded.</p> <p>The proposed developments all take up very large swathes of green belt land. Whilst the developers and planners say that other areas can be designated Green Belt in their place, this is a fundamental principle at stake. The landowners and developers who have bought Green Belt land at agricultural rates (when Green Belt was more sacrosanct) now stand to make a great deal of profit for themselves. It will also open the floodgates for further land speculation and development if the principle of de-classifying large swathes of Green Belt around Tring is allowed to go ahead. There have to be some clear principles invoked and very clear guidelines and rules on when Green Belt can stop being Green belt. Not just to suit which developer puts plans forward for any area of land that they happen to own. It must also not lead to creeping development.</p> <p>There is currently no commitment to provide any new schools or health centres, and the developer does not actually care about these. It will therefore cause major issues if the houses start before the required schooling and health requirements are catered for.</p> <p>Very major infrastructure improvements are needed well in advance of any works of any scale starting.</p>
<p>Pathside 51 Grove Road Tring Hertfordshire HP23 5PB</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and</p>

	<p>change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p> <p>Also concerned that the provision of local amenities eg school etc will not be met as is the case on many development plans</p> <p>Also as a resident who would be directly affected, no written notice of the planning application was received.</p>
<p>1 Dundale Road Tring Hertfordshire HP23 5BS</p>	<p>I object to the planning application (22/01187/MOA) because it proposes: To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages)</p>

	<p>a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>69 Beaconsfield Road Tring Hertfordshire HP23 4DW</p>	<p>How could anyone looking at this plan not object to the size of this development. It will ruin Tring with a potential immediate addition of 4,000 people, which will increase as the population ages. There are so many areas that this is catastrophic for Tring - a small market town already increased recently by a high number of new housing. Schools, doctors, hospitals, parking etc. etc. What will impact hugely is the lack of jobs in Tring. This will mean a massive increase in traffic (another 2,800 cars immediately?). The A41, which, although OK during the day, has regular accidents, queues at both ends and was originally designed as a motorway. It was downgraded to an A road with dangerously short slip roads and no hard shoulder. The regular breakdowns and accidents have to be attended by blue light police vehicles. The increase in cars affect parking and more impactful the environment. Looking at your site, and specifically the "Local Character" section, Tring will change in every aspect (not the character of buildings that this seems to centre on), but the fact that it is a small market town surrounded by green belt. How on earth has this been allowed to have even progressed this far. Have any of the planners used Station Road. I foresee many, many accidents (there are plenty already) both along this road and the junction with Cow Lane. Just in case this is not clear - I object very strongly on every level.</p>
<p>11 Harcourt Road Tring Hertfordshire HP23 5JJ</p>	<p>Dear Sir or Madam I object to the planning application (22/01187/MOA) because it proposes: To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. I am not against housing growth for Tring, however, I believe it should</p>

	<p>be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>45 Stocks Road Aldbury Tring Hertfordshire HP23 5RT</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>I believe any further expansion of Tring will require significant investment in its infrastructure (e.g. Schools, Medical Services, Roads etc.). I object to this specific planning application based on the above points. However, I also object to any further expansion of Tring unless there is a clear and unambiguous investment plan that is aligned to the planning application.</p>
<p>17 New Road Tring Hertfordshire HP23 5EY</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <ol style="list-style-type: none"> 1. To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council is currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. 2. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. 3. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.

	<p>4. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>5. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>9 Clarkes Spring Aldbury Tring Hertfordshire HP23 5QL</p>	<p>Dear Sir/Madam</p> <p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>

<p>5 Bunyan Close Tring Hertfordshire HP23 5PS</p>	<p>I object to the planning application (22/01187/MOA) because it proposes: To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed. To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon. To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever. Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so. To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment. I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
<p>7 Mortimer Hill Tring Hertfordshire HP23 5JT</p>	<p>Dear Sirs, I would like to express a strong objection to the outlandish scale of this planning application. Apart from the plan to build on Green Field sites , which is highly undesirable anyway, the proposed size and out of town location is unwarranted. This is particularly so, considering the size of the estate currently being built on the western end of Tring. Despite Government directives on house building, the inevitable impact of this development and then coupled with the above planning proposal, on local services, traffic etc is, we believe is untenable for Tring. The ruination of the countryside to meet so-called housing needs is not justified when alternative brown field sites can be found, despite the eagerness of developers to capitalise on the housing needs.</p>
<p>11 Harcourt Road Tring Hertfordshire HP23 5JJ</p>	<p>I want to add my voice to those who are objecting to the Planning Application for 1,400 houses - 22/01187/MOA. As a resident of Tring since the early 1980's, I have grown to enjoy its many amenities as a small town. The Planning Application would bring so many more</p>

	<p>houses that the small town element of Tring would be lost with no other improvements by way of compensation for the excessive growth.</p> <p>My colleagues, neighbours and friends in Tring have listed a number of objections with which I agree:-</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p>
<p>7 Bunyan Close Tring Hertfordshire HP23 5PS</p>	<p>I am writing to object, in the strongest possible terms, to the planning application 22/01187/MOA proposing the construction of 1,400 new homes on the north side of Tring.</p> <p>In short, to build housing on green belt land in an area of outstanding natural beauty would be violation of the environment and a wholesale dereliction of your duty to preserve the character of Tring as a finite market town.</p> <p>I recognise the need for more *affordable* homes, and reluctantly concede that the current sizeable development at Roman Park as necessary expansion of the town's housing capacity.</p> <p>But the proposed urban sprawl would be wholly unacceptable vandalism - and on what legal basis is Tring expected to shoulder the burden of house-building way above the national average?</p> <p>If this proposed development is not stopped, you will be turning Tring into a suburb of Milton Keynes and destroying the town's character forever. It will greatly damage the green belt.</p> <p>Specifically, in line with many other residents, my objections are as follows:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not</p>

	<p>been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS. However, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring; however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (more than 5,500 pages), a longer time period than the deadline 4 May 2022 should be provided for council taxpayers to review, digest and respond to this ecological outrage.</p> <p>Why must the population of Tring be expanded by 34 per cent?</p>
<p>85 Grove Gardens Tring Hertfordshire HP23 5PY</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p>

	<p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond.</p>
46 Grove Gardens Tring Hertfordshire HP23 5PX	<p>Destroying any green belt land is surely bad for any area, however in Tring we are surrounded by such beautiful scenery that to wipe it off the map would be even worse.</p>
15 Grove Road Tring Hertfordshire HP23 5HA	<p>I wish to object to the above planning application because it has been proposed before Dacorum Borough Council has finalised its Local Plan.</p> <p>Our local councillors are aware that there is strong opposition to building on this particular site for many reasons, not least of which are that it is Green Belt land, near an AONB and five SSI sites and also near a BBOWT site.</p> <p>The number and type of houses needed in Tring has again not been finalised. A development of this size in this position is out of proportion to the size of Tring. It also impinges on an area of outstanding national beauty which should be protected and cherished.</p> <p>The question of where to build new homes is an important one. It needs input from many bodies, full consideration of other sites and options and a longer period for full public discussion. This application should not be approved.</p>
9 Brookfield Close Tring Hertfordshire HP23 4ED	<p>I strongly oppose this application for building on this fertile farmland. This application has also been submitted in an underhand way, trying to force a decision before any proposed changes are made to the DBC Local Plan. DBC are still working on its Local Plan and with Government policy being recalled for revision the development of this site clearly does not meet with Government's recently announced policy plan to safeguard Green Belt and to focus development on brown field sites. It will also contravene the Countryside and Rights of Way Act 2000 which protects the setting of AONBs.</p> <p>I look forward to seeing this application rejected and for DBC to subsequently re circulate an amended Local Plan for further comment following the change of Governmental policy.</p>
64 Wingrave Road Tring Hertfordshire HP23 5HE	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not</p>

	<p>been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>5 Beech Walk Tring Hertfordshire HP23 5JQ</p>	<p>I object to this development. This is greenbelt and should never be built on. I totally agree with the other the other comments that disagree with the development. It is an ecological disaster with regards to loss of wildlife. The promises of schools, GP surgeries, shops etc will probably never get built. This must be stopped.</p>
<p>1 Dundale Road Tring Hertfordshire HP23 5BS</p>	<p>I object to the planning application (22/01187/MOA) because it proposes:</p> <p>To build on green belt land which is also adjacent to the Area of Outstanding Natural Beauty. Exceptional circumstances have not been provided to justify building on green belt land. Dacorum Borough Council are currently reviewing the availability of brownfield sites in urban areas to minimise the need to build on the green belt - this review should be allowed to complete, and the new local plan should be finalised before any green belt is sacrificed.</p> <p>To build on land which has the protection of the Chilterns Beechwoods SAC (Special Area of Conservation). This provides protection to green belt land near the Ashridge Estate and Tring Woodland which the proposal is planning to develop houses upon.</p> <p>To build on a scale that is inappropriate to the current size of Tring i.e. this development plus Roman Park increases the population of Tring by 34%, which will 'break' the capacity of local infrastructure and change the character of this historic market town forever.</p> <p>Additional infrastructure e.g. new schools and health centres, that is to be provided by the local authorities (Hertfordshire County Council and</p>

	<p>Dacorum Borough Council) and NHS, however, there is currently no commitment from these public bodies to do so.</p> <p>To build on a location east of Tring when there is a more suitable location (TR01), closer to the A41 and close enough for people to walk to the town centre. Should green belt land need to be sacrificed then TR01 provides sufficient space for a more proportionate growth of the housing supply for Tring with a location which will minimise the impact on the environment.</p> <p>I am not against housing growth for Tring, however, I believe it should be more proportionate to the size of Tring and located closer to the main infrastructure (High Street and A41). On a final note, due to the scale of planning application documents (over 140 and 5,500 pages) a longer time period than the 4th May should be provided for the public to review, digest and respond .</p>
<p>Mendip 53 Grove Road Tring Hertfordshire HP23 5PB</p>	<ol style="list-style-type: none"> 1. Tring is a small market town that does not have the infrastructure to cope with such a massive development. 2. Roads leading to the site would need to be upgraded as Bulbourne Road and Station road both lead to the Canal. The idea that all residents are going to use bikes is not viable. 3. It has taken at least 20 years to get a new secondary school in Tring so the proposal that the development would include new schools is wishful thinking. 4. Doctors surgeries already have to cope with the new development at Roman Park which is still ongoing. 5. The massive developments that have been built around Aylesbury over the last few years have a dramatic effect on Stoke Mandeville hospital so will residents of Tring have to be referred to Watford Hospital ? <p>Finally the developers propose to provide a public open space which is laughable as Marshcroft lane is already a wonderful safe place used by families. walkers and bikers.</p>
<p>6 Harcourt Road Tring Hertfordshire HP23 5JJ</p>	<p>I am writing to place on record my formal objection to the proposed development. My objection is based upon the following:</p> <ol style="list-style-type: none"> 1. The access to proposed development from the A41 via Cow Lane/Station Road is inadequate. The current road cannot cope with the inevitable rise in traffic heading to and from the A41. Notwithstanding the junction with Grove Road/Cow Lane/ Station Road is not suited to the demands of increased traffic levels. 2. I echo the comments made by others regarding the lack of provision of additional medical facilities and schooling for an increased population. In addition, where is it envisaged that these people will do their weekly shop? Tesco as it suits Tring fine, I do not wish this to be the prelude to an application for a Tesco Extra! Essentially Tring is not big enough for what is being proposed. 3. The inevitable loss of the Green Belt. Once built on you'll never get it back. 4. The overall development size is not in keeping with a market town of the size of Tring. Small incremental development is fine but not 1400 homes.

<p>2 Hawkwell Drive Tring Hertfordshire HP23 5NN</p>	<p>I object to the building of up to 1400 new houses in Tring because a development of this size will diminish the quality of life for everyone who lives here, with the strain on infrastructure: roads and services and lack of space. With narrow and ancient roads all around the town area, it would become gridlocked. Tring would lose its character as a small market town. I was told that the proposed cycle routes would prevent gridlocked roads but people tend to get in their cars. We would be swamped.</p> <p>Tring is in green belt land next to an area of outstanding beauty; green belt land is only to be used in exceptional circumstances. I understand that Dacorum Borough Council and Herts County Council have given no commitment to provide new schools though they feature in the plan, nor health centres.</p> <p>The plan is disproportionate and inappropriate for Tring.</p>
<p>17 Hollyfield Close Tring Hertfordshire HP23 5PL</p>	<p>We write on behalf of the supporters of the Chiltern Countryside Group (www.chilterncountrysidegroup.org) to state our strong objection to the hybrid planning application ref: 22/01187/MOA for access roads and development of up to 1,400 dwellings and associated buildings.</p> <p>We object to this application for the reasons given below which we request that Dacorum Borough Council takes into account in its consideration of these proposals. Should you require further information, please do not hesitate to get in touch.</p> <p>Our core reasons for objecting (which is not a definitive list) are:</p> <ul style="list-style-type: none"> o The application is hybrid which means that permission is sought for some of the site with full details of the remainder to follow under reserved matters, so there is no guarantee that any final development would be anything like that illustrated in the developer's promotional material. In particular, We remain extremely concerned whether the Suitable Alternative Natural Green Space (SANG) would be delivered as this, and other green spaces, will restrict the number of houses which might eventually be built for the developer's profit. o The site is currently a beautiful natural space, providing open views towards the Chilterns AONB and the Grand Union Canal, which are easily accessible to the many people who already enjoy its peace, mature green landscape and wildlife, by walking, cycling, running, horse-riding, boating, fishing.. It cannot be replaced by an artificial man made 'green area' which will take years to mature if ever built. o Local Planning Authorities have complete discretion on whether or not to accept a hybrid application. We urge DBC not to accept this. o The whole site is in designated Green Belt, which can only be released for development in exceptional & very special circumstances, (National Planning Policy Framework 20.7.21 notably paragraphs 147-9). It is quite clear that these proposals fail to fulfil that statutory obligation. o DBC is currently reviewing the

	<p>Local Plan, following community feedback from last year's consultation, with the intention to consider brownfield and urban sites within the Borough, rather than release Green Belt.</p> <ul style="list-style-type: none"> o It is imperative that this review should be finalised before any decisions are made on releasing Green Belt, particularly that of such a substantial nature and in such a significant location for the Chilterns and the Borough. Therefore this application is unwarranted and premature. o The site adjoins and informs the setting for the Chilterns Area of Outstanding Natural Beauty and will therefore have extremely high adverse impact upon that landscape, which is protected under statute by the Countryside & Rights of Way Act 2000 s85 (CROW Act). o Development will be visible from the high points of the AONB, such as Ivinghoe Beacon, thus destroying its rural and peaceful green character. o As a Local Authority, DBC has an obligation under the CROW Act to 'protect and enhance' the AONB. If this development goes ahead, with due respect, it is our considered view, that DBC will have failed to fulfil this obligation o The site is Grade 2 agricultural land - nationally, we need to increase our food self-sufficiency, not concrete over valuable farmland. Crops have already been sown ready for harvesting this year. This contribution to our nation's food would be lost forever o The large number of buildings - 1,400 houses plus 2 schools, community hub and associated roads - will drastically and adversely change the rural setting & character of the market town of Tring forever o Inevitably there will be a vast increase in traffic to/from any development onto single carriage roads, one with a narrow bridge where access is controlled by traffic lights. We do not accept the developer's premise that cycle ways and foot paths will tempt residents to completely abandon their cars to reach either the station or the town centre. It would certainly be too far to walk back from town centre shops with heavy shopping bags o The size of the proposed development is far greater than is appropriate for the present size of the town, which has already been extended recently by a large and ongoing housing development on its Western edge. o The CCG accepts there is need for housing within the Borough and affirm DBC's decision, in line with central Government policy, to optimise development of brownfield & urban sites, before any consideration of releasing Green Belt, o The developer does not state what proportion of costs they will contribute to building infrastructure, but merely 'a contribution'. o The proposals ignore extra demand on hospital health care, already under pressure. Building a health centre, which will only serve new housing, does not alleviate demand on local hospitals. o There is no guarantee that authorities responsible for healthcare and educational provision within the Borough will be willing to facilitate or financially contribute towards the schools, health centre and other community resources proposed.
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	<p>Herts CC is in the final stages of extensive renovation of Tring School and, we would suggest, is highly unlikely to make further funds available. Any new schemes for educational provision would not have been costed in under current & forecasted budgets.</p> <p>o The developer (Harrow Estates/Redrow) only owns part of the site (that nearest to Station Road) so no commitment that the whole site would be developed as is outlined in this application.</p> <p>o The timeframe of development over 11 years (2022-33) means long drawn out adverse impacts of construction, loss of amenity, increased demand on local resources without obligation for developer to provide infrastructure, and other associated adverse effects, especially for presently neighbouring residents and parking in town centre and at Tring Station</p> <p>o This site falls within the Chilterns Beechwoods Special Area of Conservation (SAC) - March 2022. We understand that DBC is required to implement mitigation to alleviate visitor pressure on Ashridge and Tring Woodlands. This site falls within the Zone of Influence and should be protected from development of any kind.</p> <p>o These proposals would have an extremely adverse effect on our Chiltern countryside, our precious Green Belt land & AONB, the Borough and the ancient market town of Tring. Again, the CCG urges DBC to refuse the application. Thank you for the opportunity to contribute to this matter.</p>
<p>39 Charles Street Tring Hertfordshire HP23 6BD</p>	<p>I am strongly opposed to this proposal for all of the reasons that so many residents have listed: overdevelopment, loss of natural habitat, deterioration of quality of life for the residents who have worked so hard to make this a unique place to live, strain on an already expanding population - the list goes on.</p> <p>I am floored by the scale of this proposed development not justified by any "exceptional circumstances." This proposal threatens to undermine everything that makes this area unique and would be a deeply painful loss for so many residents here.</p>
<p>9 Aidan Close Aylesbury Bucks HP21 9XQ</p>	<p>I have just been made aware of the application of 1400 houses east of Tring on green belt farm land.</p> <ul style="list-style-type: none"> > If you look around the area you will see the vast amount of house building that has already been built and is still being built. > On top of this we also have the horrendous devastation of HS2. > It does appear that local councils and the government do not have the environment and wildlife at heart despite the fact that global warming is already here profits are still coming before what is best for us, the environment and the planet. > We have plenty of housing, we need our green spaces.
<p>42 Lukes Lea Marsworth HP23 4NH</p>	<p>22/01187/MOA - 1400 houses in (east) Tring</p> <p>I add my name to the huge number of objections to this huge development. It will take up a large amount of fertile agricultural land, which we are supposed to be protecting; it will take away the character and image of the small historic market town of Tring;</p>

	<p>amenities in the area cannot sustain this development - schools, GP, dentist etc already stretched. There is a waiting list at Tring School and it has to support local villages as well as Tring. Village children are already in danger of being excluded due to the school's over population. Where are children in the village supposed to go to school? Also the number of vehicles it will generate, during (for many years) development, and once it is populated is detrimental to the environment. Only a small number of residents will use Tring station and it is already stretched, as is its carpark. This site is too close to the AONB and SSSIs in the area so will have a devastating affect on the wildlife habitat, and will conflict with the policies drawn up to protect the Chilterns Beechwoods. There is no way this number of new residents can mitigate the additional damage that will be caused by this number of users. A development of this size is in the wrong place and is unsustainable. Following the Roman Park development to the west of Tring there is already an additional strain on all services in the area.</p> <p>The planners will find it conflicts with just about every planning policy including guidelines set out in the NPPF.</p>
<p>1 Hawkwell Drive Tring Hertfordshire HP23 5NN</p>	<p>The following comments are made on behalf of Dacorum Sports Network (DSN) the local community sports network for the borough. We represent local sports clubs and other sports providers in the area and are Sport England recognised. We have active working partnerships with both Dacorum Borough Council, for whom we are a consultee on both strategic and operational issues, and Herts Sports Partnership.</p> <ol style="list-style-type: none"> 1. On the surface the proposed Marshcroft application (and especially the revision documents submitted in August 2022) looks as though they provide overall sports hub facilities that are both needed and welcomed as well as being well specified. 2. The delayed building of the school obviously muddies the water as to what is actually is being provided for the school and what is for the wider community. The only facility that is additional to what is required by the school and intended for their primary use appears to be the 1x youth and 2x junior football pitches to the North West of the school. This doesn't constitute a sports hub on its own and unless community use and management of additional facilities is built into a community/school use agreement it is likely to be difficult for community clubs to be full partners in the site. This can affect obtaining funding, facility management and maintenance, decisions on usage in bad weather, health and safety etc. It should be considered therefore that the sports hub and its operator had all the facilities under its control, with an educational use agreement that specified that the school (once built) had priority use of any (or even all) of the facilities during the school day / term. 3. The options for how the hub might be managed are well laid out and we do not have a problem if the council wish to retain ownership and lease or pass management control to a third party. There is at least one potential community based sports organisation (which is an incorporated charity) who have expressed an interest in taking on management of the entire hub. This would be preferable to DSN than

for a commercial operator to take it or for it to be given to Tring School / Ridgeway Learning Partnership as we are concerned that it would not be good for the community to have a closed shop / no competition between the two sports centres etc. in the town.

4. We are pleased to see in the August amendments that the proposed community centre is now to be delivered as part of a clubhouse for the sports hub adjacent to the cricket oval. If this can include changing rooms and a bar that can be run by the hub it can support the sports centre as well. It can still offer a meeting facility for community use - but it will need sufficient parking. There is clear evidence that "Sports clubs are today's community centres" and a well run club can provide and maintain a great meeting place for community of which it is part.

5. We are unclear on how fencing and providing a secure school boundary would work - would it mean fencing between adjacent football pitches for example. And we would like consideration to be given as to how the development can make sure there is still playing space for unstructured play? Also there needs to be access from the pitches outside the school boundary to the sports centre for changing rooms etc.

6. Changing the proposed specification of the ATP from W22 to football only (and not rugby as well) as in the August 22 amendments is supported. However at least one of the grass pitches should possibly be considered to be a rugby pitch for school use and a contribution to support improvement of other rugby pitches/facilities in the Town (i.e. at Tring Rugby Club) should be considered to offset the saving this amendment would make.

7. We are a little concerned about whether car parking will be sufficient for the sports centre and the school - and also what about for the cricket and football pitches the other side of the school from the sports centre and school car parks.

8. While the new Local Plan process would usually provide the most appropriate mechanism to consider a strategic approach towards meeting the current and future sports facility needs in the Tring area, DSN has concerns which are echoed by the governing bodies, the Dacorum Sports Network and local sports clubs that the Marshcroft application if approved by the Council, or by the Planning Inspectorate at appeal, before the Local Plan is finalised could inhibit this more holistic strategic approach. This is pertinent as the Marshcroft application includes facilities that may meet needs over and above those generated by the development itself. The Dunsley Farm site in Tring (if progressed as an allocation through the Local Plan) also offers potential to meet the significant community sports facility needs in the Town especially in view of its close proximity to the existing sports club sites. A discussion about a strategic approach to meeting Tring's community sports facility needs would therefore be welcomed to try and ensure a co-ordinated and complementary approach is taken if the Marshcroft and Dunsley Farm sites progress in tandem which maximises the opportunities that these potential allocations may offer but also helps ensure that each site caters for the most suitable facilities. It would be preferable to avoid a scenario where

	<p>whatever is agreed in a sports hub as part of a potential planning permission for the Marshcroft when considered in isolation then subsequently dictates what may be provided at a later date at Dunsley Farm and elsewhere.</p> <p>9. DSN has previously stated in our response to the Local Plan consultation, that: Policy SP24 - "The Dunsley Farm Site Tr01 in South East Tring has for some time been the priority site for new sporting development and expansion in Tring (see comments below). However, with a need for extra facilities in excess of 15 Ha to meet current needs, with the proposed 50% plus expansion of the town, then it is clear that more than one major new sporting location will be required for an even larger allocation of new land for sport in Tring. Therefore, the inclusion of a proposed sporting hub in the development Tr03 is welcomed; as long as there is appropriate consultation with local clubs and DSN to ensure it is delivered sustainably and with full local partnership and engagement".</p> <p>10. We believe it is critical in trying to ensure that the combined facilities proposed for the sports hub and school are appropriate and sustainable that close consultation with local community clubs (which could be managed through DSN) is undertaken at all stages of the process and especially in the formulation of community use agreements and strategies. We also believe local community organisations, especially sports clubs, would be preferred management partners for the hub; but would ask that in selecting partners an uncompetitive monopoly of such facilities in Tring should be avoided.</p>
<p>3rd Floor, Gainsborough House 34-40 Grey Street Newcastle Upon Tyne NE1 6AE</p>	<p>Representations Planning Application Ref. 22/01187/MOA - Hybrid Planning Application at Land East of Tring</p> <p>We write on behalf of our clients, L&Q Estates, regarding the live Hybrid planning application (reference 22/01187/MOA) at Land East of Tring as submitted by Harrow Estates, herein the 'Harrow' application. The Harrow application seeks full planning permission for the two main access points from Bulbourne Road and Station Road, and Outline consent on the remainder of the site with all matters reserved.</p> <p>The Outline element seeks to demolish all existing buildings on the site and replace them with 1,400 dwellings, a new local centre and sports /community hub, a primary school, a secondary school, and public open spaces, including the creation of a Suitable Alternative Natural Green space (SANG).</p> <p>L&Q Estates have a commercial interest in the site known as Land at New Mill, which is a c.15ha site located immediately to the southwestern boundary of Land East of Tring - this site is identified as site 'Tr02: New Mill' which is identified as an allocation for housing development in the latest draft of the Local Plan. Given the scale of the two development sites and the prospective policy requirement for the sites to be delivered comprehensively and cohesively and having considered the various documents that support the Harrow application, we provide Dacorum Borough Council with a number of</p>

observations to ensure the Hybrid application is compliant with the draft policies and allows Land at New Mill to come forward as intended by the Local Planning Authority (LPA) as set out in the Dacorum Emerging Strategy (2020 - 2038) for Growth published in November 2020.

We have focused our attention on the documents which would be approved as part of any Outline consent and in particular, the submitted Parameter Plans and documents submitted for approval at this stage.

Draft Growth Area Policy Tr02 and Tr03

As highlighted above, Dacorum Borough Council are currently in the process of preparing their new Local Plan and published the draft Plan for consultation under Regulation 18 in November 2020. The Plan, titled the 'Dacorum Local Plan (2020-2028) Emerging Strategy for Growth' sets out the preferred spatial strategy for the Borough, including preferred allocations for new development.

Both the New Mill site and Land East of Tring site are allocated as "Major Urban Extensions" in the emerging Local Plan; the New Mill Site is allocated under ref. 'Tr02: New Mill', and Land East of Tring has a proposed draft allocation ref. 'Tr03: East of Tring'.

The preamble to Draft Policy SP24 (Delivering Growth in East Tring) states that the expansion of Tring to the East represents the single largest combined allocations in the town, and one of the largest growth areas in the Borough. It continues, setting out that growth will come forward over a long period of time, across multiple sites [including across allocations Tr02 and Tr03] and in a sensitive location, which requires a cohesive approach which binds these elements together.

Draft Policy SP24 then details how the Sites are to come forward, requiring a "Masterplan-led approach" which will be prepared by the Council and adopted as a Supplementary Planning Document, but this will also be prepared in collaboration with key partners and landowners and be subject to community and stakeholder involvement.

Draft Growth Area Policies Tr02: New Mill and Tr03: East of Tring provide further detailed requirements for the two sites, confirming that the allocations should be planned together, preferably as a joint plan or as a minimum through closely aligned masterplans taking an integrated approach to the joint site area. The policies also require high quality green infrastructure and sustainable transport linkages between the two sites, including connections to the new community hub, local centre and primary and secondary schools.

Specifically, draft Policy Tr03 requires the creation of a new green corridor linking the new woodland area to the northeast of the site with the existing built-up area of Tring, along Marshcroft Lane to the adjacent allocation "New Mill".

Masterplanning

An Illustrative Masterplan has been prepared on behalf of the applicants - Harrow Estates, and forms part of the submission documents for the Hybrid Application. As far as we are aware, the Masterplan, whilst for illustrative purposes, has not been prepared in collaboration with Dacorum Borough Council as required by Draft Policy SP24 and it has not been developed in conjunction with L&Q Estates who are a key stakeholder in bringing forward sites Tr02 and Tr03.

Nevertheless, it should be ensured that the Site is now brought forward as part of a comprehensive Masterplan with strategic infrastructure appropriately planned for to meet the needs arising from both the occupants of the new development (in accordance with the planning obligations test) and the existing residents of Tring (for example, through the provision of educational facilities that will be used by the wider community). We would ask for the Council to be assured by the applicants, through the setting of parameters for the proposals, to ensure that it meets with the policy aspirations to create a sustainable development which integrate the Site, not only with the proposals for Land at New Mill, but also with the existing settlement of Tring.

Movement and Connectivity

Draft Policy SP24 also requires a number of deliverables in the development of Land East of Tring, including promoting sustainable travel choices by delivering an integrated and accessible development with walking, cycling and public transport prioritised. Whilst the proposals as put forward in the current Hybrid application at Land East of Tring appear to be in broad compliance with the site-specific requirements of Policy Tr03, including providing the land uses required, the Development Framework Parameters Plan and Movement and Connectivity Parameter Plan (as well as accompanying parameters and Illustrative Masterplan) do not suggest any pedestrian, cycle, or vehicular links between Land East of Tring and Land at New Mill.

On the contrary, both the Development Framework Parameter Plan and Movement and Connectivity Parameter Plan show the segregation of the two sites through a green buffer, consisting of existing hedgerows, allotments, and amenity space. This is more evident on the Illustrative Masterplan, which although illustrative, shows this barrier more clearly.

As part of their case for Very Special Circumstances, the applicants have proposed primary and secondary schools, along with a new sports and recreation facility to meet gaps in provision. The land uses have been provided to help alleviate existing pressures on education and other facilities already existing in the town, which have been identified as nearing capacity. The proposed facilities, however, are not as accessible to the wider locality as they could be, particularly to the north of the Site, both in terms of enabling pedestrian and cycle connections to Land at New Mill and externally beyond this Site from Bulbourne Road into Tring, whereby the conditions for cyclists and

pedestrians leading to the proposed access point for the Site could be improved to encourage sustainable journeys to, for example, the educational and / or leisure facilities. It is also important to note that a number of sustainable route options need to be provided for varying users seeking to reach the facilities, including for example more lightly trafficked routes for more vulnerable users. Offering choice is the best way to get users to utilise more sustainable methods of travel.

Further, as part of wider highways considerations, it is requested that the Council, when reviewing the access proposed as part of this application, ensures that the scheme put forward can allow for a further access at Bulbourne Road for Land at New Mill in accordance with the emerging policy requirements.

The submitted Landscape and Open Space Framework Plan submitted does show gaps in the parcels of proposed built form along the boundary with Land at New Mill, yet these are shown to contain the existing hedgerow and vegetation. There are no identified access points highlighted on the Movement and Access Plan as indicative primary walking or cycling or general access routes. To ensure that future access between the Sites is maintained as a parameter for future reserved matters applications as envisaged by the emerging Local Plan, it is recommended that points of access between the Sites are identified at this stage.

Of assistance in this regard, it is important to note that L&Q Estates, in carrying out their own assessment work for Land at New Mill, have established that there are a number of existing gaps in the hedgerow on the boundary of the two sites. Such gaps could provide an opportunity for the creation of a pedestrian and cycle linkage through a sustainable green corridor without any significant removal of the existing soft landscaping. It is suggested that two points of access are maintained between the Sites, one in a central location to allow ease of access to the sustainable transport proposals (although noted the bus stop location is indicative at this stage) and another to facilitate a more direct access to the educational and community facilities, which would require an access point where the allotments are currently proposed to meet Land at New Mill.

Phasing

Draft Growth Area Policy Tr03 requires the site to be brought forward with a comprehensive phasing programme for development which is to be prepared in consultation with the Local Planning Authority.

The Planning Statement submitted in support of the Hybrid application suggests that the development is anticipated to commence on site in 2023, with first residential occupation taking place in 2025, and full completion by 2033. Although it is understood that this information is contextual and that details are likely to be confirmed through additional approvals as required by any planning permission for the Outline proposal.

A Draft Phasing Plan has also been provided as part of the application submission and shows indicative phases of development. The Plan

suggests that the spine road leading from Marshcroft Lane to Station Road will be delivered as part of a first phase, and the spine road leading from Marshcroft Lane to Bulbourne Road will come forward along with two residential parcels as a second phase. The residential cells located on the boundary of the New Mill Site are predominantly anticipated to come forward in phase 4 and phase 5+.

Whilst this is a more detailed point for a later stage, it is suggested that the phasing of parcels 4 and 5 should take place at an earlier stage in the overall build process to enable the comprehensive Masterplanning of the urban edge of Tring prior to the parcels that be adjacent to the SANG. We would, on behalf of L&Q Estates, therefore, question the justification behind the phasing proposed.

Summary

In summary, while the proposed development has regard for the forthcoming proposals at the New Mill site and has taken into account many of the site requirements of draft allocation Tr03, little reference has been made to Tr02 Land at New Mill, other than to state that both Sites can be delivered.

Dacorum Borough Council as the Local Planning Authority must be content that a cohesive approach is taken between the two development sites. It is suggested that clear parameters are identified showing integration with neighbouring proposals linking Land at New Mill prioritising walking, cycling and public transport between the two development sites. In addition, to provide integration with the existing settlement of Tring itself particularly to the north of the Site, to ensure wider accessibility benefits and multiple route options for more vulnerable users of the facilities and to utilise more sustainable methods of travel. Further, it should be ensured that access can be accommodated on Bulbourne Road for Land at New Mill to be developed at an appropriate stage in the future, alongside Land East of Tring. These aspects would better achieve the aspirations identified within the emerging policies that provide direction for the development of the land.

Finally, we would ask Dacorum Borough Council to ensure that other infrastructure be comprehensively planned and delivered in a timely manner, including the new community hub, local centre, primary and secondary schools and other facilities that will be used more widely.

L&Q Estates would be happy to enter into further discussions with both Harrow Estates and Dacorum Borough Council to ensure a cohesive approach is taken in developing the Sites going forward. Should any changes be made to the proposed means of access, parameters and/ or description/ scale of development, we would appreciate being informed via email.



Dacorum Community Review Panel

Report of Formal Review Meeting: Marshcroft Garden Suburb

Tuesday 18 January 2022

Zoom video conference

Panel

Tony Burton (chair)
George Bull
Richard Dewhurst
Broony FitzPatrick
Quentin Halfyard
John Kjorstad
Angela Lynch
Carole Niven
Michael Ridley
Andrew Roberts
Max Smith

Attendees

Martin Stickley	Dacorum Borough Council
Jane Hakes	Dacorum Borough Council
Sarah Whelan	Dacorum Borough Council
Fiona Bogle	Dacorum Borough Council
Ronan Leydon	Dacorum Borough Council
Colin Lecart	Dacorum Borough Council
Andrew Parrish	Dacorum Borough Council
Alex Robinson	Dacorum Borough Council
Philip Stanley	Dacorum Borough Council
Rebecca Williams	Dacorum Borough Council
Keeley Mitchell	Dacorum Borough Council
Deborah Denner	Frame Projects
Joe Brennan	Frame Projects
Kate Trant	Frame Projects

Apologies / copied to

James Doe	Dacorum Borough Council
Nathalie Bateman	Dacorum Borough Council
Juliet Amoruso	Dacorum Borough Council
Jo Deacon	Dacorum Borough Council
Neil Robertson	Dacorum Borough Council
Chris Taylor	Dacorum Borough Council

Declaration of interest

George Bull is a member of the Community Review Panel and is currently residing adjacent to the site proposed for review, with his back garden sharing a boundary with one of the fields which form the development site.

1. Project name and site address

Marshcroft Garden Suburb, Station Road, Tring, Hertfordshire HP23 5QY

2. Presenting team

Rob Coles	David Lock Associates
Bob May	Ryan & May
Sam Ryan	Ryan & May
Phil Brady	Stantec
Ashleigh Genco	Harrow Estates

3. Planning authority briefing

The site is an allocated site in Dacorum Borough Council's emerging Local Plan, for around 1,400 dwellings. However, the Local Plan is currently on hold whilst the Council investigates urban capacity within Hemel Hempstead and whether it can avoid losing further Greenfield sites.

The dwellings include affordable, elderly persons' accommodation, first homes and self / custom-build. The proposals also include new vehicular and pedestrian / cycle routes, a local centre with retail, health, community and work spaces, a sports / community hub, allotments and orchards, primary and secondary schools and areas of open space and parkland including Suitable Alternative Natural Greenspaces (SANGs). The site lies partially within an area of archaeological importance and there are areas of local wildlife in close proximity. The project brief is for an outline planning application (for submission Spring 2022) for a new residential suburb linking the existing settlement of Tring with Tring Station.

Planning officers asked for the panel's comments on:

- the proposed character and appearance of the development and whether it would integrate successfully with the neighbouring land uses and the settlement of Tring
- the location of the proposed housing and other facilities
- the layout (does it respect existing residents, provide sufficient accessibility, etc.?)

4. Community Review Panel's views

Summary

The panel feels that the proposals for Marshcroft Garden Suburb have many positive attributes. It welcomes the way the scheme will better link Tring with its station, and the consideration given to schools, healthcare, transport, walking and cycling routes. The panel admires the approach to the scheme's landscape and to maintaining and increasing the

biodiversity of the site, which will enable access for leisure and recreation as well as wildlife. It also agrees with the decision to create one neighbourhood centre, rather than two. However, it encourages further thought about how the development can be integrated with Tring. It would also like to see an aspirational and ambitious approach to sustainability, low carbon design, ecological value and climate change mitigation. If this site is to be released from the Green Belt, it should be an exemplar for sustainable living. As part of this process, it recommends greater analysis of the wildlife and habitats across the site is undertaken. The panel also asks for further thought about traffic management on the site as well as the implications for the wider area. It recommends that approaches to traffic management are informed by local knowledge as well as traffic modelling. These comments are expanded below.

Integration of development with Tring

- The panel would encourage the design team to explore how the development can be better integrated with Tring and is concerned that, currently, it appears to be envisaged as a separate neighbourhood.
- As currently proposed, the scheme will have its own primary and secondary schools, shops, sports and leisure facilities, access and circulation network.
- It suggests developing the idea of a porous green boundary, which would provide good access with cycling and jogging / pedestrian paths to draw the existing population into the new development.
- The panel also asks for clarity about how the proposed density of 32 dwellings per hectare compares to existing densities in Tring?
- Although the scheme is currently at a masterplan stage, when detailed designs for the new homes come forward, these should draw inspiration from the architecture of Tring.
- The panel highlights that the issue of integrating existing and new communities should be addressed in relation to other Dacorum sites coming forward.

Infrastructure

- The panel asks for further thought about the level of infrastructure required to support Marshcroft Garden Suburb.
- It thinks that improvements may be needed to infrastructure across the Tring area, particularly when taking into account other sites that are still to come forward.
- For example, without measures to alleviate traffic levels, the likely increase in traffic using roads such as Silk Mill Road will be problematic.
- The panel is also concerned about how the development will accommodate new communities before the full extent of the infrastructure has been completed.

- For example, it will be essential that schools and health services for new residents are completed early in the development. This will require careful planning, as these community facilities will be delivered in collaboration with other bodies.

Access and traffic management

- The panel is encouraged by the ambition to eliminate through traffic by ensuring that the development's access road is to be treated as a community road with traffic-calming measures. However, it is concerned about the impact on traffic in the wider context.
- It suggests further consideration of the layout of the local centre, as it relates to pedestrian, cycling and traffic management.
- The panel describes how Tring has embraced cycling in the past and is optimistic that the proposed provision for cycling will be taken up by the local community, particularly given the proximity of the new development to the town centre.
- The panel welcomes the ambition for the development to be designed to offer a full set of opportunities for travel in order to minimise car use.

Cycle / footway between the town and Tring station

- The panel applauds the proposal to create an improved footpath to Tring railway station from the existing town along the southern end of the new development. It feels that this will form an important part of the new development and its links to Tring.
- The panel suggests exploration of the possibility of more development along Station Road, which it feels is likely to have a positive impact on the walking / cycling route to the station.
- For example, it questions whether additional development could be created on the triangle of green space to the south-east of the site.

Sustainability and low carbon design

- The panel expresses its firm belief in the importance of incorporating zero carbon practices in construction and use throughout this scheme. It urges the design team to be ambitious in its approach to achieving net zero, for example, through site layout, energy sources, detailed design and use of materials.
- If this site is to be released from the Green Belt, it should be an exemplar for sustainable living.
- The panel supports an ambition to create a flagship scheme for this proposal—and others to follow in the Borough—that places DBC at the forefront of sustainable development.

- The panel would welcome careful consideration of how the development can be built to fit the architectural context of Tring, whilst at the same time demonstrating current best practice in sustainable design.

Water and drainage

- The characteristics of the area mean that natural drainage will need to be addressed, particularly around the canal.
- The panel looks forward to further detail on the ways in which water is to be managed across the scheme, once more information is acquired from the range of tests and surveys currently underway.
- The panel suggests that a combination of local knowledge and engineering solutions could offer the best solutions to the management of water, in relation to futureproofing against changing weather and rainfall events.

Landscape and biodiversity

- The panel admires the approach to the scheme's landscape and to maintaining and increasing the biodiversity of the site, which will enable access for leisure and recreation as well as wildlife.
- The panel would like to see the management of these elements clearly defined as part of the proposal.
- The panel asks for further thought on how the scheme can create wildlife corridors with and beyond the site boundaries.
- The panel is pleased to see the emphasis in the proposal on retaining the site's mature network of hedgerows and trees, as well as the intention to enhance this wherever possible.
- The panel points out that the existing network of eight paths along the canal is well-known and well-used.
- It also brings to the applicant's attention the condition of the paths alongside the reservoirs, particularly in winter, where weather conditions make them unfit for use; this may become a greater issue as footfall increases.
- The panel is pleased to see the incorporation of a wild area into the scheme but suggests that other elements such as swift and bat boxes are introduced across the development.

Next steps

The Community Review Panel is available, if required, to provide further input once designs have reached the next stage of development.

APPENDIX D: NATIONAL PLANNING POLICY FRAMEWORK (2021) – PARAGRAPH 149

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.