

As this new application has an increased number of flats and parking spaces and also has only 6 electric vehicles as opposed to 20 in the previous application I would like to point out the following.

The applicant is claiming this development promotes high levels of sustainability. However, there are factors which do not point towards this building being as sustainable as claimed, i.e. its location and its longevity/future-proofing.

As pointed out by Highways Authority in the prior application, the site is not considered to be particularly sustainable or accessible to alternative modes of transport due to the site being outside of accessibility zone 3 in DBC's accessibility zones document, there being a low frequency of buses serving the area, the site being 1000m or a 15 minute walk to the train station and the area not being cycle friendly. I would also point out that as the site is adjacent to the main and very busy junction into the town, this would not be very welcoming to pedestrians either. Considering this and the potential for high traffic generation the development conflicts with paragraphs 17,34 and 35 of the National Planning Policy Framework.

"Para 17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan making and decision taking. These 12 principles are that planning should:

actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;"

*"Para 34. **Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.**"*

*"Para 35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. **Therefore, developments should be located and designed where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;**"*

No matter how sustainable a building's design, surely it can only be truly sustainable if located in a sustainable location.

It has also been pointed out that fitting electric car charging points to automated parking systems is economically unfeasible and would leave only 6 charging points for electric vehicles. It is proposed that these 6 charging points as they are fast charging points (which are only compatible with the newest of electric vehicles) will be shared by all residents. This would surely not be practical or sufficient considering the extremely large number of residents thus again conflicting with paragraph 35 of the NPPF.

*"Para 35. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. **Therefore, developments should be located**"*

and designed where practical to incorporate facilities for charging plug-in and other ultra-low emission vehicles.”

I would also like to point out a number of policies in Dacorum Borough Council’s Local Plan which conflict with the development’s increased density (now over **1200 dwellings per hectare**), its location out of the town and local centres (also bearing in mind this gateway location is shown as a green gateway and wildlife corridor in figure 20 of DBC’s Core Strategy) and lastly its extremely out of character (with surrounding areas), modern design.

“POLICY 21 DENSITY OF RESIDENTIAL DEVELOPMENT “

“Densities will generally be expected to be in the range of 30 to 50 dwellings per hectare net.”

“Higher densities will generally be encouraged in urban areas at locations where services and/or workplaces can be reached without the need for motorised travel or which are served well by passenger transport, for example at town and local centres.”

“For sites at the edge of an urban area, special attention will be paid to the effect of development density on open countryside and views. In such locations proposals will be expected to retain existing trees and hedges and incorporate appropriate landscaping in order to achieve a soft edge to the countryside.

Housing proposals will not be permitted if the density of the scheme would adversely affect the amenity and/or existing character of the surrounding area or would fail to satisfy the design criteria in Policy 11.”

“POLICY CS10: Quality of Settlement Design

At the broad settlement level, development should:

(a) respect defined countryside borders and the landscape character surrounding the town or village;

(b) reinforce the topography of natural landscapes and the existing soft edges of towns and villages;

(c) promote higher densities in and around town centres and local centres;

(d) protect and enhance significant views into and out of towns and villages;

(f) preserve and enhance green gateways; and

(g) protect and enhance wildlife corridors.”

“POLICY CS11: Quality of Neighbourhood Design

Within settlements and neighbourhoods, development should:

(a) respect the typical density intended in an area and enhance spaces between buildings and general character;

(b) preserve attractive streetscapes and enhance any positive linkages between character areas;

(c) co-ordinate streetscape design between character areas;

(d) protect or enhance significant views within character areas;

“POLICY 31 GENERAL EMPLOYMENT AREAS

The scale and nature of development proposals in General Employment Areas will be

assessed having regard to:

(i) the character of the particular General Employment Area;

(iii) the character of adjoining areas;

(iv) the accessibility of the location for motorised vehicles, passenger transport, cyclists and pedestrians; and

(v) traffic generation and highway impact.

Two Waters employment area:

All development must be designed and landscaped to minimise the impact on and enhance the semi-rural character of Boxmoor.”

The cumulative affects of incremental developments should also not be overlooked with regard to traffic generation. Nearby proposal H/2 (National Grid and 339-353 London Road) will include 160 dwellings, Proposal MU/4 (Hemel Station Gateway) 200 dwellings, the nearly completed 36 dwellings in Apsley High Street and the development of the Hewdon Hire site 15+ dwellings.

“POLICY CS9: Management of Roads

All new development will be directed to the appropriate category of road in the road hierarchy based on its scale, traffic generation, safety impact, and environmental effect. The traffic generated from new development must be compatible with the location, design and capacity of the current and future operation of the road hierarchy, taking into account any planned improvements and cumulative effects of incremental developments.”

'Another material consideration to take into account should be the Two Waters Framework which highlights the Two Waters junction as a significant problem for bottle necks and peak hour traffic congestion even without this addition of 272 flats. '