

DEF comments on Sustainability Appraisal Scoping Report

(Extracts from Sustainability Appraisal Scoping Report, with section numbers, in black)

(DEF comments in Green)

3 SA Framework

3.1 Environmental and Sustainability Objectives

Current guidance on SA/SEA of land use and spatial plans advocates the use of objectives in the appraisal process.

A framework of objectives, criteria and indicators (the 'SA Framework') was used during the SA of the Core Strategy 2013 and Site Allocations DPD 2014. That SA Framework, which was originally developed in 2006, formed the 'starting point' for the SA Framework for the new Local Plan and has been modified in order to remove some duplication and to add additional criteria that were not fully covered by the previous framework.

The sustainability objectives are quite distinct from the Local Plan objectives. They focus on outcomes, and define the basis for achieving social, economic and environmental sustainable development. They have been compiled using information from the review of relevant plans and programmes, baseline review and review of key issues.

The purpose of the SA Framework is to provide a way in which the effects of the plan can be described, analysed, and compared. This process involves considering the content of the Local Plan against the identified SA/SEA objectives.

The sustainability objectives included in the SA Framework are arranged under SEA/SA topics. The topics selected cover the topics listed in the SEA Directive and Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

The SA Framework contains a high level objective for each topic, supported by a set of more detailed sub-objectives (appraisal criteria) for use when assessing Plan policies and considering wider whole-Plan effects. For undertaking the assessment of the individual site allocations and area specific policies a more detailed set of site specific criteria has also been developed. This full SA Framework is presented in Table 3-1.

1.5 Dacorum Local Plan

Dacorum's new single Local Plan will incorporate an 'early partial review' of the Core Strategy (adopted in September 2013), together with an update to the Site Allocations DPD and updated development management policies (currently 'saved' policies within the Dacorum Borough Local Plan 1991-2011).

Through the 'early partial review' Dacorum Borough Council is explicitly required to look again at:

- ☐ household projections;

- ☐ the role and function of the Green Belt affecting Dacorum, including long-term boundaries and the potential to identify safeguarded land beyond 2031;

3.2 Compatibility of SA Objectives with Local Plan Objectives

A compatibility assessment between the SA objectives and the Local Plan objectives will be undertaken at the next stage of the SA/SEA in order to identify whether there are any incompatibilities or tensions between certain objectives. Where potential incompatibilities are identified these will need to be taken into account when undertaking the assessment process and appropriate mitigation measures or alternative approaches considered in the Local Plan.

Overall the SA Framework scores well in its aspirations, and as such deserves to be an "equal partner" with the Local Plan as far as future developments are concerned. Therefore, in order to help give effect to the excellent "Table 3-1: SA Framework", as well as or instead of sections "Issues and opportunities", "Sustainability appraisal objectives and sub-objectives" there should be "Policies", where the language is more prescriptive. A case in point is the preservation of wildlife corridors in the face of Green Belt development, for which see our comments under for instance 2.2.2.5 "Green Infrastructure". In instances that are outside DBC's direct control the Framework should state the policies and objectives they would like to see. For instance under "2.7 Material Assets", in support of (2.7.4) "There is the opportunity to promote the use of renewable

resources, protect natural resources and reduce waste", the Framework should suggest the policies and objectives that HCC could adopt to reduce the extraction of minerals.

There appear to be some topics that are missing from the SA and that should be included.

Searches for the words "fly-tipping", "litter" and "graffiti" find nothing. All of these activities are spiritually detrimental to the majority of Dacorum's population.

3.3 Inter-relationships between SA/SEA topics

- Air quality influences human health which affects quality of life and also economic activity.
- ☐ Local residents and businesses experience air quality at the local level, which affects health and amenity.
- ☐ A healthy natural environment improves quality of life. Provides economic benefits through attracting inward investment and increased revenue through tourism.
- ☐ Economic growth if undertaken unsustainably could adversely impact upon these assets.
- ☐ Greenhouse gas emissions could lead to significant climate change which is likely to affect water resources (supply and demand), alter habitats, affect air quality and public health and increase flood risk. These could all adversely impact upon the Borough's economy.
- ☐ Cultural heritage contributes to the overall diversity and value of the landscape. It also provides economic benefits and is a source of enjoyment for the population.

- An attractive landscape improves quality of life which in turn could contribute to increase inward investment. Green infrastructure provides health and wellbeing benefits.
- ☐ Noise pollution can both affect tranquillity of landscapes and have adverse effects on health and wellbeing.
- ☐ Woodland provides an important role in carbon sequestration.
- ☐ Material assets include resources such as land, building materials and other resources which are non-renewable. The topic is concerned with the efficient use of resources, including re-use of brownfield sites and sustainable waste management.
- ☐ The quality of the material assets in the borough contributes to overall quality of life and can impact upon the region's economy.
- ☐ Soil resources are key to sustaining the agricultural economy.
- ☐ Climate change is resulting in more extreme weather conditions and will heighten flood risk and demands on water resources.
- ☐ Negative synergy likely for flora and fauna when water bodies with low water flow combined with poor quality water
- ☐ Benefits of improved human health include employment provision and contribution to the local economy, training, research opportunities, reduced burden on social services and public finances.
- ☐ Provision of housing to meet local needs is important both for the wellbeing of communities and also for the local economy.
- ☐ Poor health and well-being will adversely impact upon economic growth in the borough.
- ☐ Social considerations and quality of life will impact on employment opportunities and ability to attract inward investment.

In addition:

- Greenhouse gas emissions and climate change relate to sustainable waste management, transport and industry, including the construction industry.
- Provision of housing to meet Government-specified targets above local needs will increase the population.
- Housing and employment are linked growth factors, an increase in each potentially creating a demand for the other over an extended time frame.
- Transport and health should be linked, via policies to encourage people to undertake relatively short trips on foot.

2.1 Introduction

This section summarises the findings from the SA/SEA scoping stage on the environmental and sustainability planning context within which the new Local Plan will be developed.

- Environmental Factors
 - Biodiversity, including flora and fauna, and geodiversity;
 - Climatic Factors;
 - Air Quality;
 - Landscape and Townscape;
 - Cultural Heritage;
 - Material Assets;
 - Soil; and
 - Water.
- ☑ Social Factors
 - Population;
 - Health and Wellbeing;
 - Housing; and
 - Transport and accessibility.
- Economic Factors
 - Economy, employment and education

2.2.2.2 Area-wide Biodiversity

The Natural Environment White Paper (2011, with updates to 2014) recognises that nature conservation cannot be purely focussed on protecting designated sites. Such sites are too small and fragmented to safeguard the full range of habitats and species on their own. The White Paper therefore called for a much wider approach to reversing the long term decline in biodiversity by expanding and linking habitats to restore ecosystem funding.

Within Hertfordshire this has resulted in an 'Ecological Networks' project. The results of this work concluded that overall habitat network connectivity is currently very poor in Hertfordshire and as a result so is the ecosystem integrity and resilience.

In addition to the designated sites in the Borough, an Urban Nature Conservation Study also identified areas of wildspace⁹ that are in close proximity or within the main settlements.

The key areas identified were:

- ☑ Gadebridge Park in Hemel Hempstead;
- ☑ the land around Longdean Meadow Nature Reserve;
- ☑ the land in the Bulbourne Valley, south of Chaulden;
- ☑ the land to the northern and southern settlement fringes of Bovingdon; and

☐ the northern part of Tring Park around the mansion and southern edge of Tring inside of the A41.

Other areas include the Wendover Arm of the Grand Union Canal and the gravel lakes and Priory site allotments at Kings Langley. At Berkhamsted, the woodlands on the southern edge of the town are identified as important, although the severance created by the A41 is an issue. In addition, the Urban Nature Conservation Study identifies areas of wildspace deficiency, including part of the green wedge north of Hammerfield, Hemel Hempstead.

This omits to mention the recently designated wildlife site (LWS 65/098/01) on the Former Halsey School Playing Fields, now known as "The Halsey Field". This site was surveyed in 2014 by the Hertfordshire and Middlesex Wildlife Trust. It is now managed under licence from HCC by The Friends of Halsey Field, with assistance from the Chilterns Society, The Osborn Property Group, and with financial assistance from The Boxmoor Trust and other donors.

There are in addition smaller areas and fringes that should be included, for instance the woodland strip between Northridge Park and Green End Lane, one of the few places to have blue as well as the commoner white wood anemones, although these currently appear to be in danger from a floor-covering of ivy.

2.2.2.5 Green Infrastructure

'Green Infrastructure' is a network of protected sites, nature reserves, habitats, green spaces, waterways and green linkages that is integral to the health and quality of life of sustainable communities.

It brings a range of benefits, assisting with pollution control and flood management, improving the health and well-being of residents by providing space for leisure activities, reinforcing the character and identity of places, helping support renewable energy production, as well as having a positive impact upon social interaction.

Green infrastructure provides a setting for the Borough's towns and villages, threading through and connecting them to the wider countryside. It contributes to the character of the area, helping to give Dacorum its strong sense of place and high quality environment, and is particularly important on the urban fringe, where it helps to soften the transition between urban and rural landscapes.

The high level green infrastructure network for Dacorum includes key landscape features, strategic wildlife corridors and areas of high biodiversity. Dacorum Borough enjoys a rich, diverse and often high quality natural environment. Key elements are chalk streams and river valleys, wetland and grazed pastures, dry chalk valleys and chalk landforms, woodlands and ancient woodlands, historic parklands and designed landscapes and farmland. It has a number of strategically significant and historic green infrastructure assets, such as the Ashridge Estate, Tring Park, the Marsworth Reservoirs complex and the Grand Union Canal. It also has a historically important mid-20th century urban green infrastructure legacy in the 'designed landscapes' by Geoffrey Jellicoe at Hemel Hempstead New Town¹⁶.

With the forthcoming consultations on Master Plans for the Local Allocations imminent, it is important to have a policy regarding the preservation of properly functioning Green Corridors within the proposed developments. For instance in the case of LA3 the "Development Requirements" in Dacorum's 1996 Borough Plan Pre-deposit Consultation proposals allowed a "Substantial open space link between Shrub Hill Common and countryside" by leaving a strip some hundred yards wide between the new development and the existing Fields End estate. This was described in the 1996 Technical Report 3 of the Dacorum Borough Plan first review to 2011) as "Parcel B", "a natural area for open space linking with Shrub Hill Common". Since then Friends of Shrubhill Common, together with advice from Martin Hicks of the Herts. Biological Records Centre have compiled the following suggestions that could help reduce the adverse environmental impact of LA3 on Shrubhill Common Local Nature Reserve, by providing more effective Wildlife Corridors.

(Guidelines issued by English Nature¹ state that Wildlife Corridors should:

- **be preserved, enhanced and provided, where this can be cost-effective, as they do permit certain species to thrive where they otherwise would not**
- **corridors should be as wide and continuous as possible**

- **their habitat should match the requirements of the target species.)**

The target species should be those that are currently found, or potentially found, in Shrubhill Common, namely the typical species of unimproved chalk grassland. An ideal Wildlife Corridor would therefore combine the existing native hedges with a strip of grassland, which should be mown 1/3rd at a time, once per year. The grass cuttings should be removed. Grass footpaths could be mown through the area more frequently.

Bearing all these factors in mind, an optimum arrangement for a Wildlife Corridor would combine a swathe of grassland not otherwise used for public recreation, (except as a visual asset, and a mown footpath).

The above considerations apply both to the “Central Corridor” route and to the HH20/Chiltern Way route, for which more detailed suggestions are supplied in Sections 3.1 and 3.2 below.

1.1 Preferred Option - HH20/Chiltern Way route

The ideal corridor would be the swathe of land between the two hedgerows to the west of HH20/Chiltern Way, currently designated as H1, H2, H7 on the draft Master Plan. This has long been the opinion of our advisor from the Herts. Biological Records Centre. This swathe of land currently contains two fields at the bottom end that are currently used for hay making, so these could, with suitable management, revert over time to an area of unimproved grassland, and would therefore be the obvious location for an extension to Shrubhill Common.

This is the most obvious location for a corridor radiating out towards Potten End, as it would be consistent with the other patterns of open space in Hemel Hempstead which, termed “Green Lungs” were an essential part of the original master plan for the New Town. Other surviving examples are Warners End playing fields and Gadebridge Park. This option would secure a decent lifeline out to Potten End, and the larger (wider) this can be, the better. It would also help preserve some of the character and amenity value of the Chiltern Way as it passes through our Borough.

1.2 Second Option - HH20/Chiltern Way route

If the whole area currently designated H1 H2 H7 cannot be used as the Wildlife Corridor, a strip of land parallel with and immediately to the west of the existing HH20/Chiltern Way western hedgerow should be so designated. This would back onto the back-gardens of the new housing. Physical barriers such as sturdy kissing gates could deter flytipping and motorcycle access.

As to the width of this strip, field edge strips left for environmental purposes can be anything from 2 to 12 m wide, but in view of the special circumstance of the Local Nature Reserve, and the practical ongoing management requirement to gang mow it (see Paragraph 3 above), the width in this case should be no less than 15m.

2.3 Climatic factors

2.3.1 Key policy context

Ways in which local planning authorities should go about supporting the move to a low carbon future include:

☐ *“plan[ning] for new development in locations and ways which reduce greenhouse gas emissions;*

☐ *actively support energy efficiency improvements to existing buildings; and*

- *when setting any local requirement for a building’s sustainability, do[ing] so in a way consistent with the Government’s zero carbon buildings policy and adopt nationally described standards”.*

The NPPF requires that local authorities should set out strategic policies to deliver climate change adaptation as well as mitigation. The NPPF states that: *“Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape”.* It recommends that new development should be avoided where possible in areas vulnerable to the increasing risks and impacts of climate change. Where development does go forward in these areas, the NPPF states that *“care should be taken to ensure*

that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure”.

2.5 Landscape and Townscape (P31)

2.5.1 Key policy context

The NPPF requires that local planning authorities should protect and enhance valued landscapes, in particular:

☑ *“Set[ting] criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged”* taking into account their status/importance and their contribution to wider ecological networks.

☑ Placing great weight on *“conserving 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 landscape and scenic beauty”*.

☑ *“Plan[n]g positively to enhance the beneficial use of the Green Belt”* and ensuring that when any planning application is considered, *“substantial weight is given to any harm to the Green Belt”*.

☑ Avoiding new development that will give rise to *“significant adverse impacts on health and quality of life”*, *“mitigat[ing] and reduc[ing] to a minimum other adverse impacts on health and quality of life arising from noise from new developments”*.

☑ Setting policies that *“identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason”* and which *“should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”*.

2.5.5 Sustainability appraisal objectives and sub-objectives

To conserve and enhance landscape and townscape character and encourage local distinctiveness

☑ To protect and enhance landscape and townscape character

☑ To evaluate the sensitivity of the landscape to new/inappropriate developments and avoid inappropriate developments in these areas

☑ To protect ‘dark skies’ from light pollution, and promote less invasive lighting sources while considering the balance between safety and environmental impacts

☑ To minimise the visual impact of new developments

☑ To encourage contribution of public art

Aspirations to preserve sensitive landscapes should be backed up by unambiguous policies if the SA is to have any influence on the Local Plan and Master Plans. For instance the current DPD says in respect of LA3 that *“Development will be spacious and will allow views of the countryside across the valley”* which is clearly at odds with the objective stated elsewhere in the same document to *“Soften views of housing from the countryside”*. At present developers can choose which of the two conflicting objectives to heed.

2.7 Material Assets

2.7.2.1 Waste

In 2013/14 about 83,378 tonnes of waste were sent to energy recovery facilities (ERFs), where waste is burnt to produce electricity and heat whilst waste sent to landfill increased from 2012/13 by 6,339 tonnes. However, this will significantly reduce in future years as disposal arrangements move more towards energy from waste.

**** These arrangements, whilst indicating a move from the use of landfill sites to ERF, demonstrate that Hertfordshire has a lack of in-county disposal options and a need for increased waste transfer by road to access regional facilities.

******* 2.7.4 Issues and opportunities**

- Waste production and disposal is a growing problem. Production of waste and disposal of this waste is becoming increasingly difficult, with diminishing numbers of suitable sites for landfill disposal.

Hertfordshire as a county is having to use sites in Buckinghamshire and Oxfordshire in order to meet its needs. There is however, an increasing move towards ERF facilities rather than landfill.

*******2.7.5 Sustainability appraisal objectives and sub-objectives**

To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible

The SA should declare a policy of promoting a 'circular economy' of materials with minimal or no destruction of them. Counting energy generation from incinerators as 'renewable', 'sustainable' or part of a 'circular economy' is misleading, while the extraction of metals from incinerator bottom ash rather than from collected waste for 'recycling' is wasteful. The residual materials (from local sorting) should be put through local facilities of cleaning, sorting and baling. Organic wastes should feed composting and anaerobic digestion plants, with their by-products of heat, electricity and gases. This would promote local employment.

2.7.2.3 Land use

In Hertfordshire, there are conflicting pressures on land use. This is particularly true for housing and associated infrastructure which has to be balanced with the protection of the natural environment⁶¹, as well as the preservation of the Green Belt

Please see comments under "Population" below.

2.9 Water

This section seems to be very descriptive and to lack firm policies to address the various water-related challenges that Dacorum faces.

Although Section 2.9.2.2 Water quantity states that "The Chilterns Chalk Streams are particularly susceptible to over abstraction" it does not say that these are **rare** features on a world scale, supporting a distinctive ecosystem and that therefore they must be specially protected.

Dacorum is in the west of the eastern region and therefore has a much higher rainfall (810mm av per annum) than the east of the region (600mm av per annum), but we still have an over abstraction problem, to which the Report pays insufficient attention. In particular there is no plan to mitigate the effect of further housing developments which could cause the Gade and Bulbourne to dry up, e.g. by considering other sources of water.

The Reprt needs more emphasis on river pollution (chemical and sediments) from major and minor road drains and should contain policies to tackle it.

The section on flooding does not emphasise that much of the minor flooding is caused by a failure to keep drains clear, and contains no policies or commitments to improve this.

2.9.2.3 Flood risk: the third bullet should be "Two Waters Road" not "Waters Road"

2.9.4 Issues and opportunities: the 7th bullet is not strong enough. There should be a policy of 'ensuring' rather than merely 'encouraging' SUDS, because an aspiration phrased as proposed can be simply ignored by developers.

2.9.5 Sustainability appraisal objectives and sub-objectives: The third bullet "To improve ecological status and flow of rivers and encourage practices which reduce nitrate levels in groundwater" should contain specific proposals and policies as to how this will be achieved.

2.10 Population

2.10.1 Key policy context

The 'Population' topic in this SA/SEA primarily relates to demographics, about which there are very few specific plans, policies or strategies.

Objectives relating specifically to demographics (not attempting to alter them, but rather to adapt to changes in future demographics), may be found in documents focusing on sustainable development.

In 2016 the Office for National Statistics (ONS) published the 2014 based sub-national population projections for England covering the 25 year period from 2014-2039. They project population in districts using recent trends in birth and death rates and migration. The projections do not take account of the future implications of local, regional or national policy. The population in Dacorum during the period 2014-2039 is forecast to grow from 149,700 to 184,800⁹². By 2031, the end of the Core Strategy plan period, the population is projected to be 175,000 (16.6% increase from 2014) This implies that there is absolutely nothing that Dacorum can do about its population growth and the ensuing consequences of it which exacerbate all other quality of life issues which are the subject and purpose of the SA. There are however a couple of areas where there should be policies in place. These concern respectively unwanted pregnancies and giving preference to local rather than imported labour.

Public health became the responsibility of local government when it transferred from the NHS to local authorities in April 2013. This briefing for councillors and officers explains the challenges facing councils and the opportunities they have to tackle teenage pregnancy and reduce health inequalities in local communities. <https://www.populationmatters.org/uk-lg-sexual-health-guidance/>

Local employers should be encouraged to do their bit – working to train and support local young people, avoiding agencies that only recruit from abroad, and shunning dodgy practices with accommodation included in order to get round the minimum wage.

2.11 Health and Wellbeing

2.11.1 Key policy context

The NPPF also highlights the importance of access to high quality open spaces and sport and recreation facilities to community health and wellbeing. The NPPF recommends having up to date needs assessments for open space, recreation and sport facilities to indicate demand and highlight opportunities for new provision.

With respect to rights of way, the NPPF provides the following guidance: *“Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails”*.

This should be strengthened by emphasising the preservation of the quality of experience of footpath users, particularly when large developments take place. For instance, in LA3 this would increase the chances of maintaining the full amenity value of Public Footpaths HH20, HH21 (from Fields End Estate to Pouchen End Lane) and HH91 (Pouchen End Lane to Rowcroft) which currently provide a valuable circular walking route with a rural character for residents of Warners End and Chaulden. Criteria here and elsewhere should be:

- Minimal diversion of route,
- Maintenance of rural footpath character (i.e. pedestrian-only use, no tarmac, garage forecourts, urban pavements, playing field equipment or pitches),
- Extra tree lines to protect, and means of preventing motorcycle and flytipping access.

2.11.5 Sustainability appraisal objectives and sub-objectives

To improve the health and wellbeing of the local population

☐ To include measures which will improve everyone’s access to high quality health care facilities

☐ To promote and enable the health advantages of walking and cycling and community based activities

☐ To identify, protect and enhance open spaces, such as rivers and canals, parks and gardens, allotments and playing fields, and the links between them, for the benefit of people and wildlife

☐ To minimise noise and odour pollution, particularly in residential areas

☐ To narrow the income gap between the poorest and wealthiest parts of the area and to reduce health differential

☑ To take health and access issues into account in new developments

We support "promote and enable the health advantages of walking". The encouragement of walking - and by implication the removal of those factors that hinder it - is desirable in terms of carbon emission reduction as well as for reasons of public health, the latter having been underlined in 2012 by The National Institute for Health and Clinical Excellence, who were reported by Nick Triggle Health correspondent, BBC News 28 November 2012, as saying that people should shun their cars if a trip could be done in 15 or 20 minutes on foot or bike, and calling on councils to do more to make walking and cycling an easier option in local communities.

There should be policies to address pavement parking which causes a hindrance to walking. Currently both the police and the Local Authority have powers in this area, but seem keen to minimise their own responsibilities and/or to place them at each other's doors.

Reports to the police of pavement obstruction over recent years had resulted in some telephone responses which indicated that there is an unwritten policy that they may take action if the parked vehicle has not left enough room for a wheelchair to pass on the pavement (kerbside or fence-side). However, several recent reports to the police of pavement parking in Hemel Hempstead that contravened even this criterion had gone unanswered and un-actioned.

There should be a policy to counter an increase in parking on grass verges and open spaces, to the detriment of public enjoyment of these amenities. We understand that this is currently prosecutable, though prosecutions appear to be rare. Besides prosecutions, the policy should favour the physical protection of these green spaces from parking.

We support "minimise noise and odour pollution, particularly in residential areas" but question the preceding complaint statistics. These do not state to whom the complaints are made, and the fact that they appear to be getting fewer could well be explained by earlier complaints not being dealt with, therefore demotivating potential complainants. Daily experience tells us that there are a number of illegally loud vehicles around, and there are few if any reports of prosecutions.

DIY activities can cause prolonged periods of nuisance for neighbours, and are at present not bound by the same working hours constraints as contractors. There should be a policies to obtain powers to curtail building work based on the scale of the operation, regardless of whether it is claimed to be "DIY".

DIY and other construction work also cause danger to health by generation clouds of particulate dust from stone cutters. There should be policies to ensure that dust-suppressing measures are taken for all such work.

To improve air quality there should be a policy to encourage the use of electric vehicles. The most effective way of doing this would be to allow free parking for such vehicles at Council-controlled car parks.

2.12 Housing

122 Dacorum Borough Council (2013) Core Strategy 2006-2031

2.12.2.4 Gypsy and travelling communities

A Traveller Needs Assessment (TNA) carried out in 2013 reported an increase in the numbers of Gypsies and Travellers having a more settled existence and travelling less, with 85% of those interviewed indicating that they had lived on their current site for more than five years.

2.12.4 Issues and opportunities

- The Borough's population is changing with growing numbers of elderly residents forecast as a result of increased life expectancy. While this will add to the number of one person households and the population in communal homes, there is also evidence of an increase in the number of young children and more sharing. The past long term trend of declining household size has slowed significantly.

- The price of housing compared to earnings is an issue.
- The need for new pitches for Gypsies and Travellers is difficult to estimate accurately, principally because of the nomadic lifestyle of the communities themselves: it is difficult to identify all sources of need and there is a danger of double-counting individual requirements across different local authority areas.
- Meeting needs of Gypsy and Traveller communities even when they no longer choose to travel
This does not appear to take account of the revised policy issued by the Department of Communities and Local Government in August 2015 (entitled “Planning Policy for Traveller Sites”) which is a significant new material consideration. The new policy document changes the previous definition of “gypsies and travellers” so that gypsies and travellers who have ceased to travel permanently no longer fall within the definition. The question of bringing forward the previously-recommended start date for LA3 depends crucially on this because of the Government-specified "Five Year Supply" rule.

2.13 Transport and Accessibility

2.13.1.1 Relevant plans, policies and programmes

The Hertfordshire CC “Transport Vision 2050 Consultation” (2016) is absent from the list of documents included under this heading. This document contains imaginative and farsighted proposals that DEF are largely in agreement with.

DEF has produced a policy document highlighting areas of agreement with the HCC consultation, with additional suggestions. An abridged version of this is appended below at the end of our comments on 2.13.

2.13.2.3 Public transport

Re: “A growth in passenger numbers means that the rail network is running at capacity and no major improvements are planned in the foreseeable future.”

A plan has been mooted, but rejected, that there should be a short interlink between the West Coast Line and Crossrail in the Old Oak Common / Wilkesden Junction area. This would facilitate travel from West Hertfordshire, and further north to West London and beyond while avoiding the London terminals. The advantages of this proposal should be reconsidered. After HS2 is operating, there could be more capacity on the West Coast route to facilitate this.

Re: “There is a good level of bus services in Hemel Hempstead”

DEF supports the view that the bus service loses passengers because there are too few services to and from the Railway station, particularly in the evening, so people do not use the bus to get to the station.

2.13.2.6 Travel behaviour

Re: “According to the 2011 Census, Dacorum has an average of 1.40 cars per household. Within the Borough, 16% of households reported having no car, 41% had one car, 32% had two cars and 10% had three or more cars. This is similar to the Hertfordshire figures

While these figures are in line with Hertfordshire as a whole, a significant proportion of Hertfordshire residents are rural, who rely on cars more. The figure, if typical of Hemel Hempstead, is unacceptably high, given that many residents are close to a bus route, but are deterred from using buses. The prevalence of on-street parking, (and, regrettably, on-verge and obstructive on-pavement parking) is exacerbated by the town plan inherited from the early New Town Commission. DEF strongly supports moves away from car use to sustainable modes of transport, particularly when the driver is the only occupant. This would also achieve improved air quality (Table 3-1: SA Framework, Item 5 (Air Quality) refers.

Appendix to Comments on 2.13 Transport and Accessibility:

DEF statement on transport Policy in HCC with particular reference to Dacorum

Preamble: This document is not an overall policy statement, rather a list of suggestions to be incorporated into such a statement and refers to matters that could be the responsibility of HCC or DBC or other authorities.

Underlying principle

Recent press reports (Telegraph, 10th August) suggest that over the next 20 years there will be a huge “order of magnitude” increase in storage of electrical energy. This will enable the grid to supply sustainable electricity needed to charge electric vehicles without a huge increase in CO₂ emissions. This opportunity should be matched by authorities basing all transport that is under their control or influence to be electrically powered from sustainable sources.

Current situation:

The older “new towns” were planned when multiple car ownership was not endemic or the aspiration of residents. There are now serious issues with excessive car ownership, resulting in dangerous parking, obstructed footpaths, ruined grass verges and loss of visual amenity. HCC and DBC should have an **aspiration** to reduce reliance on cars for short commuting and social journeys. This could be achieved by “carrot and stick” incentives:

- electric bike charging points;
- bike lanes;
- improved bus services, including those for surrounding villages;
- paved canal paths so that they can be shared with cyclists, with segregation from walkers and anglers;
- more controlled parking zones, and yellow lines, particularly on junctions;
- Many more Permit parking-only areas, with the aim of reducing in the long run the number of vehicles per household;
- bye-laws to restrict obstruction by cars on pavements, parking on grass verges;
- More effective enforcement of traffic infringements when they occur.

Improved public transport is key to this, and is predicated on there being more demand for Public Transport if the aspiration is achieved.

- Cheaper bus fares would encourage more use, but this does not necessarily result in loss of income if bus usage were to increase
- Buses serving outlying villages with circular routes could be particularly efficient. Examples of specific bus routes are included in the Appendix 1 to 3
- Bus Services between towns should travel directly between centres, with as few stops as possible, in order to speed up journeys
- Connectivity between different routes should be developed to the maximum extent. This includes Bus / Bus routes, and Bus / Train routes;
- Uncertainty of bus times can be eased by an inexpensive QR code on each bus stop, which when read by a smart phone would indicate the likely arrival time of the next bus, not the scheduled time. Money would have to be put aside for developing the software, if it doesn't exist already.
- HCC and DBC should lobby for an enlarged TFL to include Home Counties, akin to the erstwhile London Regional Transport Authority. Amersham, Chesham and Watford already benefit from TFL, and this will include the whole length of Crossrail when complete.
- Other suggestions for public transport are in appendix 4 to 6.

There needs to be more “**thinking out of the box**” regarding public transport. Old problems can be solved by unconventional ideas. The distinction between affordable or assisted bus routes and privately run Taxi service needs to be blurred.

As an example, to assist commuters getting away from stations in the evening there could be a hybrid taxi / bus scheme, in which a small bus or a minibus takes all the commuters needing to go to one area, with a sat-nav type software to deliver each person to their own postcode by the most efficient route. There would be a flat fare, plus a small surcharge to take each person to their destination. There is potential for charging this electronically. This is an example of a possible “Demand Responsive Minibus”

Transport and Air Quality.

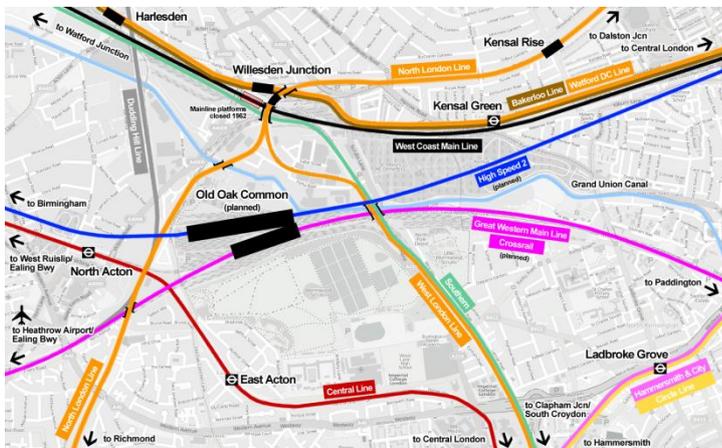
There are significant localities where Air Quality falls below acceptable standards. This could be addressed by:

- Rapid conversion to Hybrid and Electric buses.
- Adjacent schools could share school buses from the same catchment area.
- “Smart” traffic lights could reduce the deadtime when no vehicles are entering the junction from any direction, thus reducing the queues of waiting traffic. For an example, see appendix 8.
- Roundabouts should replace traffic lights whenever there is room. There is potential for “Smart” traffic lights to smooth the flow into roundabouts at peak times of the day.
- Traffic should be encouraged to run at a uniform speed, with reduced speed limits.
- Speed bumps should be phased out; braking and accelerating at bumps increases fuel consumption and air pollution (The damage to vehicle suspension by speed bumps is well attested. This could be more dangerous than other methods of traffic calming).

Infrastructure

There has already been a suggestion that the new East - West Cross-Rail link could connect to the Euston line with West Coast services with a relatively short section of track in Willesden Junction / Old Oak Common area.

(<http://www.standard.co.uk/news/transport/plans-to-extend-crossrail-to-hertfordshire-will-cut-journey-times-into-london-by-15-minutes-9653512.html>) This would link Hertfordshire residents with the West of England, East and West London, and reduce journey time into London Paddington



Unfortunately, this proposal has recently been shelved, but HCC / DBC should lobby vociferously for this initiative to be reconsidered.

Planning permissions for new developments with car parks should be turned down when the extra traffic impinges on already heavily congested areas. For an example, see appendix 7.

Safety

Road signs, and road markings are an integral part of Road Safety, and drivers rely on these for safe judgements. Currently, throughout the county there are obliterated or illegible road signs, and non-existent road markings. If an accident were to be attributed to these failings, the compensation could be more than the cost of effectively rectifying the faults. Lighting needs to be good and road signs should be clearly displayed. It is vital to have clear white lines at junctions,

kerbside and in the middle of the road, and an infrastructure plan should prioritise maintenance of this.