



# **Dacorum Borough Council**

## **Local Planning Framework**

### **DACORUM CORE STRATEGY EXAMINATION IN PUBLIC**

**Statement by Dacorum Borough Council**

**Issue 3: Accessibility**

**September 2012**

## **Purpose of this statement**

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

## Matters raised by Inspector

- 3.1 What are the transport implications of the locational strategy for housing and employment? Will the strategy facilitate the use of sustainable modes of transport?
- 3.2 Have the transport needs been properly identified and have those needs been adequately addressed? Is the reliance on forthcoming Transport Plans appropriate?
- 3.3 Is the Council's approach to car parking provision clear and justified?
- 3.4 What are the small-scale improvements referred to in paragraph 4 of Policy CS9?

## Dacorum Borough Council's Response

### **3.1 What are the transport implications of the locational strategy for housing and employment? Will the strategy facilitate the use of sustainable modes of transport?**

- 3.1.1 One of the core planning principles within the National Planning Policy Framework (NPPF) (Examination Document REG14) is to *“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”* (eleventh bullet point of paragraph 17). This is reflected in advice in paragraph 30 that *“In preparing Local Plans, local planning authorities should...support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”* In accordance with these requirements, transport and movement considerations have been a key factor in determining the locational strategy for housing and employment within the borough.
- 3.1.2 As set out in response to Issue 2, this strategy is based around directing development to more accessible locations that are well connected to a range of services and facilities. This will minimise the need to travel, and where travel is required, maximise opportunities for modal shift.
- 3.1.3 Challenge 1: Balanced and Sustainable Growth (section 4 of the Pre-Submission Core Strategy) recognises that *‘By carefully considering the location of homes, jobs and essential services, travel demand can be managed, congestion and pollution eased and all residents given better access to where they work, shop and spend leisure time. This can also help to reduce the predicted growth in traffic on the M1 and other heavily congested routes through central Hertfordshire.’*
- 3.1.4 The Council has worked with the local highway authority (Hertfordshire County Council) in developing this strategy and it has their support (see Statement of Common Ground: Examination Document SG4). They consider that the

objectives and policy approach taken to improve sustainable transport within the Core Strategy is appropriate and, whilst it will pose some challenges, it provides an appropriate basis to facilitate the use of sustainable transport and to attract investment in sustainable transport options. The Council understands that the Highways Agency is satisfied that the strategy is appropriate and has confirmed that there is sufficient transport evidence for the Core Strategy to progress (see Examination Documents SUB8 and SUB10).

- 3.1.5 The relative accessibility of the borough's towns, large villages and the wider countryside has also been a determining factor in the settlement hierarchy (see Map1: Key Diagram and Table 1: Settlement Hierarchy). Policy CS1: Distribution of Development states that decisions on the scale and location of development will be made in accordance with this settlement hierarchy. Through a strategy of directing development to existing settlement, the existing transport network is supported. The focus on Hemel Hempstead in particular as an area of greatest growth and change (and location of the borough's 'Key Regeneration Areas') helps to promote sustainable modes of transport and the application of an 'accessibility zones' approach (see question 3.3 below) and by reflecting the New Town structure through the creation of a new neighbourhood to the west and extending existing new town neighbourhoods where infrastructure capacity exists. This approach accords with paragraph 38 of the NPPF.
- 3.1.6 Policy CS2: Selection of Development Sites has a strong emphasis upon the relative accessibility of sites, giving priority to locations within defined settlements, before considering extending beyond these boundaries. It requires all sites to allow good transport connections (criterion (a)). Policy CS8: Sustainable Transport explains this locational requirement further and embeds the principles of development being well connected and accessible into the Core Strategy.
- 3.1.7 In terms of housing, both the overall distribution and choice of individual sites has been considered in the context of maximising accessibility and potential for sustainable modes of transport. The Sustainability Appraisal framework (Table 4-2 of Examination Document SUB3) has been used used to assess the overall strategy and inform the direction and scale of future growth (through the choice of local allocations). Objective 13 of this SA framework is *"To deliver more sustainable patterns of location of development."*
- 3.1.8 Advice from the highway authority also played an important role in considering the choice of greenfield housing locations (through the 'Assessment of Potential Strategic Sites and Local Allocations,' Examination Document HG15). Where advice was not provided for individual sites, a general highway authority assessment relating to the particular settlement was provided. The sustainability appraisal process was also used to assess growth options for the outward expansion of Hemel Hempstead (Examination Document HG10 and section 5.4 of Sustainability Appraisal Report: Examination Document SUB3). This included consideration of potential new transport infrastructure such as a northern bypass for the town.
- 3.1.9 In terms of employment, the Council's strategy is to retain an appropriate spread of employment uses around the borough, to provide opportunities for local people

to choose to work locally. Whilst it is recognised that there will always be a concentration of employment land at Maylands due to the planned structure of the New Town, it is important to protect other employment areas within the town, and wider borough, to improve both choice and accessibility.

3.1.10 The Maylands Business Park and Hemel Hempstead Town Centre are identified as 'Key Regeneration Areas' within the borough (see Map1: Settlement Strategy). Whilst this concentration of growth and change poses some challenges, it also offers opportunities for encouraging modal shift. There is already evidence that the approach set out in the Core Strategy will facilitate the use of sustainable modes of transport and attract investment in sustainable transport. This demonstrates compliance with paragraphs 34 and 35 of the NPPF.

3.1.11 The County Council has recently been successful in obtaining funding under the 2012 Local Sustainable Transport Fund (LSTF) for sustainable transport initiatives in Hemel Hempstead. This programme of initiatives, called 'Big Herts for Big Ideas' ([www.hertsdirect.org/services/transheets/transplan/ltplstfund2011](http://www.hertsdirect.org/services/transheets/transplan/ltplstfund2011)) includes work on green travel planning and improvements to walking and cycling routes. It will help deliver the vision for Hemel Hempstead set out in the Core Strategy, and take forward some of the initiatives within the Hemel Hempstead Urban Transport Plan. The LSTF business case demonstrated that this package of sustainable transport interventions set out for Hemel Hempstead will increase public transport demand by 12%, cycling demand by 22% and walking demand by 3%. Both the Borough council and the highway authority are looking to build on this success. Having local-based UTPs in place will help to support future funding bids, both in Hemel Hempstead and Berkhamsted and Tring (see question 3.2 below).

3.1.12 Policy CS34: Maylands Business Park sets out a number of movement principles for the area that will guide new development. This includes measures to improve sustainable transport by securing an integrated public transport hub and taking measures to facilitate easier walking and cycling through the business park. The delivery of these principles will be supported through the Maylands Area Travel Plan (Examination Document TR8) and the Maylands Parking Strategy (Examination Document TR9).

3.1.13 As part of work on the draft master plan for Hemel Hempstead town centre (Examination Document MP4), considerable attention has been paid to improving access to services and facilities and encouraging modal shift. The masterplan has been informed by a detailed Access and Movement Strategy (Examination Document MP3). Policy CS33: Hemel Hempstead Town Centre provides the policy framework for this master plan and requires the following sustainable transport measures:

- Provision of an integrated public transport hub and circulation within the centre;
- Provide better east-west links, particularly for pedestrians;
- Continue the riverside walk from the Plough Zone to Gadebrige Park; and
- Improve cycling provision.

3.1.14 In addition to Hemel Hempstead, the highway authority has highlighted that

transport issues are a particular constraint within Berkhamsted – due to the size of the town, its topography, the distribution of uses and the concentration of activity in a central area. A higher level of development than that currently proposed is therefore not considered to be appropriate in this location (see pages 68-69 of the Assessment of Potential Strategic Sites and Local Allocations: Examination Document HG15). The Berkhamsted Movement Strategy, agreed with the highway authority and contained within the current Dacorum Borough Local Plan remains relevant and will be reviewed through work on the Berkhamsted and Tring Urban Transport Plan (see question 3.2 below).

3.1.15 A range of sustainable transport interventions have been identified in conjunction with the highway authority and included in the Infrastructure Delivery Plan (IDP) (Examination Document ID5). These will be brought forward in a timely manner alongside planned development.

3.1.16 As required by the NPPF (paragraph 32), Policy CS8 requires all developments generating significant amounts of movement to TAs and Travel Plans. For the local allocations these TAs will be produced as part of the masterplanning process. The Council is currently recruiting a specialist Sustainable Transport Officer to maximise the impact of these Travel Plans by working with developers to ensure sustainable transport options are actively promoted and support modal shift.

3.1.17 In terms of sustainability considerations, the approach set out in Policies CS8: Sustainable Transport and CS9: Management of Roads has been assessed as having positive effects against the majority of objectives within the sustainability framework (see section 6.3.5 of Examination Document SUB3). When the strategy is considered as whole the conclusion of the sustainability consultants is that *“focussing development in locations which are most accessible by all forms of transport should improve access to services and facilities, particularly for those people without access to a private car. Also releasing sites for development based on the benefits it will bring to the settlement could also have a positive effect.....”* (section 6.9.6 of Examination Document SUB3)

**3.2 Have the transport needs been properly identified and have those needs been adequately addressed? Is the reliance on forthcoming Transport Plans appropriate?**

3.2.1 The Core Strategy has been informed by a range of technical work. This includes traffic models developed by the highway authority and Highways Agency, transport assessments for key development sites, the Hertfordshire Infrastructure and Investment Strategy (HIIS) and the Dacorum Strategic Infrastructure Study and its update (e.g. Examination Documents TR2, TR4, TR7, ID1, ID3 and ID5)

3.2.2 It also supports, and is supported by, a number of other strategies and plans. These include the Local Transport Plan (LTP) and its daughter document (Examination Documents REG13), an Urban Transport Plan for Hemel Hempstead, (Examination Document TR10), a draft UTP for Berkhamsted and Tring and a borough-wide cycling strategy (Examination Document TR3)

- 3.2.3 All of the above, together with feedback from the highway authority and Highways Agency as part of public consultation, has ensured that the borough's transport needs have been fully identified and addressed. The Core Strategy is therefore considered to fully comply with paragraph 162 of the National Planning Policy Framework which requires local planning authorities to assess the quality and capacity of infrastructure, including transport.
- 3.2.4 The strategy has the support of the highway authority (see Examination Document SG4). The Council understands that the Highways Agency is also satisfied that the strategy is appropriate and has confirmed that there is sufficient transport evidence for the Core Strategy to progress (see Examination Documents SUB8 and SUB10).
- 3.2.5 A range of detailed modelling work has been undertaken to assess the potential impact of growth and where necessary identify potential interventions. Whilst the model outputs show some junction improvements are required, they do not identify any 'showstoppers' in terms of the overall locational strategy.
- 3.2.6 Highway Agency's DIAMOND model for South West assessed the cumulative impact of development across south west Hertfordshire on the strategic road network which is operated and maintained by the Highways Agency.
- 3.2.7 The development of a specific transport model for Hemel Hempstead has allowed for a more focussed analysis of the likely implications of growth in and around the town upon the local highway network. There have been a number of iterations of this transport model to reflect changes in the growth strategy as the Core Strategy has progressed - the last of which was undertaken in August 2010. This modelled the expected level of growth within the town combined with the effects of the local allocations.
- 3.2.8 Further modelling work is currently underway to ensure that proposals set out within the draft Town Centre Master Plan are fully assessed. Although the outputs of this modelling work are not yet known, the highway authority has advised that there are not expected to be any significant additional impacts beyond those already identified through earlier iterations of the Hemel Hempstead Urban Transport Model.
- 3.2.9 The Hertfordshire Infrastructure Investment Strategy (HIIS) (Examination Document ID1), Local Transport Plan (LTP) and its daughter documents (Examination Documents REG13) provide a more holistic overview of the impact on the wider transport network and identify appropriate interventions. Transport issues are considered in detail within the Dacorum Strategic Infrastructure Study (Examination Document ID3), together with its update (Examination Document ID5), and necessary interventions included within the accompanying Infrastructure Delivery Plan.
- 3.2.10 Whilst section 9 of the Core Strategy sets out the Council's general approach to transport, issues specific to a particular town or village, or to the countryside, are highlighted in the relevant Place Strategy. In some cases these local issues have

required more detailed transport assessments to be undertaken. This includes consideration of the need for a new link between Springfield Road and New Road in Northchurch (Examination Document TR5) and work to inform the Maylands Area Travel Plan (Examination Document TR8).

- 3.2.11 At this local level, the highway authority has also been working with the Council and landowners to determine the impact and deliverability of the strategic sites and local allocations identified within the Core Strategy. This has been an iterative process and the highway authority has been consulted throughout. A key role has been to assess the impact of each site and identify appropriate access/egress arrangements. Key highway issues and expected arrangements are set out in the Statements of Common Ground and planning statements prepared for these sites (Examination Documents SG1-3 and SG5-8). Through this work the highway authority has been able to confirm that they are satisfied that all of these sites are deliverable in highways terms.
- 3.2.12 This local level work, combined with the more strategic level modelling and infrastructure assessments have ensured that the transport needs of the Borough have been properly identified and appropriately addressed.
- 3.2.13 Urban Transport Plans are produced by the highway authority in consultation with the local planning authority and other relevant bodies. Whilst the LTP identifies the strategic level transport improvements required within the county, Urban Transport Plans (UTPs) provide a more detailed focus. They help prioritise investment in smaller-scale transport schemes and set out a framework within which to focus local transport investment. The relationship between the Core Strategy, the Local Transport Plan and Urban Transport Plans is summarised in paragraph 9.11 of the Pre-Submission Core Strategy (Examination Document SUB1).
- 3.2.14 The UTP for Hemel Hempstead (Examination Document TR10) was published in January 2009. Its key findings are reflected in the Hemel Hempstead Place Strategy and IDP. The UTP covering Berkhamsted and Tring is currently in draft form and initial discussions on its content have informed the Place Strategies for these areas.
- 3.2.15 All proposals from the LTP and Hemel Hempstead Urban Transport Plan are reflected within the Council's Infrastructure Delivery Plan (Examination Document ID5). Any additional local initiatives arising from the UTPs for Tring and Berkhamsted will be added when the IDP is updated through the Council's annual monitoring report process. The IDP will play an important role in ensuring funding is available to deliver key schemes, through informing negotiations on site-specific legal agreements, setting the borough's CIL rate and supporting future funding bids. For example, the Council has recently been awarded £3.5 million through the Growing Places Fund to provide road infrastructure needed to unlock develop opportunities in the Gateway area of the Maylands Business Park and a greenfield housing site (Spencers Park) in the north east of Hemel Hempstead. Detailed proposals set out with UTPs can also be reflected in proposals within the Site Allocation and Area Action Plan DPDs.



3.2.16 The Council will continue to work with the highway authority and other partners to ensure transport schemes essential to support the Core Strategy are delivered.

### **3.3 Is the Council's approach to car parking provision clear and justified?**

3.3.1 The Council's approach to car parking expressed through the Core Strategy is simple, clear and supported by the local highway authority whose policies are being taken forward.

3.3.2 Parking standards are set out within an Appendix to the Dacorum Borough Local Plan 1991-2011 Examination Document OT1). They include requirements for car, lorry and bicycle parking. Discussions are on-going with the highway authority and other Hertfordshire authorities as to whether these standards should be reviewed. Any such review would take place through the Development Management DPD.

3.3.3 In accordance with paragraph 39 of the National Planning Policy Framework and advice from the highway authority, the Council has adopted an 'Accessibility Zones' approach to car parking. This approach is set out in a supplementary planning document ('Accessibility Zones for the Application of Car Parking Standards; Examination Document TR11). The use of an SPD provides greater flexibility to review zones if there are any significant changes to accessibility e.g. through the improvement or removal of train, bus, cycle or pedestrian links or the provision of new services and facilities.

3.3.4 The broad approach is to accommodate car parking at residential developments (limited in the most accessible locations) and constrain car parking at destinations to affect journey mode choices. In setting standards, the Council recognises that restricting off-street residential parking tends to encourage on-street parking.

3.3.5 When applying standards to specific development scheme the Council will also take account of other factors such as advice from the highway authority on highway safety issues, the local parking situation and the need to promote economic development and regeneration. This approach is set out in criterion (h) of Policy CS8: Sustainable Transport.

3.3.6 The approach to on-site car parking is complemented by controlled parking zones (CPZs) in Berkhamsted and Tring and through managed off-street public car parks in the three towns and the large villages of Kings Langley and Markyate. This managed parking regime complies with paragraph 40 of the NPPF in terms of the overall levels of parking provision, charges and enforcement.

### **3.4 What are the small-scale improvements referred to in paragraph 4 of Policy CS9?**

3.4.1 This phrasing is a continuation of the current Local Plan policy agreed with the highway authority. Small scale improvements would normally be identified through the local transport planning process i.e. through local Urban Transport Plans. A UTP has been prepared for Hemel Hempstead and the UTP for Berkhamsted and Tring is currently in draft form.

3.4.2 Junction improvements would be a typical example of a small-scale improvement. A recent example, delivered through a new development scheme, is a short link road in central Apsley and the associated closure of the Storey Street junction with London Road.

3.4.3 Improvements identified through the Hemel Hempstead UTP are listed within the current Infrastructure Delivery Plan (Examination Document ID5). Any additional schemes resulting from new or updated UTPs will be added as this IDP is reviewed.