



Labour Party – Berkhamsted and Tring Branch Response to Dacorum Local Plan 2024-2040

Meeting Citizens' Needs – not Developers

A Summary of our Feedback on the Revised *Strategy for Growth* is as follows:

- **Social Housing First** – The priority should be to build Social Housing – what citizens want and most need ([Link 1](#));
- **More Social Housing** – we propose 80% , rather than 20%;
- Prioritise building on **Brownfield Sites**, not Green Belt, arable farmland;
- Building should be close to **Public Transport (bus and rail)**;
- More detail and commitment on **Green Issues and interventions**;
- More detail and commitment on **Infrastructure Issues**;
- Ensure that **sustainability requirements for green construction** are stated in procurement in the construction phase to achieve the goal of **net zero development**.

This feedback applies to proposed plans for Berkhamsted and Tring. We have not commented on the Hemel Hempstead, Kings Langley, Bovingdon or Markyate changes, although our general feedback still applies. In our original response to the Dacorum Local Plan we provided detailed feedback on many aspects of the plan. ([Link 2](#)) Clearly, these still stand – this response focuses on the changes identified by Dacorum Council in the revised *Strategy for Growth* plan which, in our view, are in many cases, not positive changes and do not reflect our earlier response to the Strategy. This is explained in more detail below.

Social Housing First – before other Housing

While the plan is to 2040, our concern is that there needs to be more about phasing of new housing. There should be a specific commitment to prioritise Social Housing in the early stages of the plan. This is where there is a pressing need. The Affordable Housing requirement for Private Sector developments is often watered down during the building process. With a likely change in government and removal of counter-productive restrictions that are preventing councils from building social housing directly, the *Strategy for Growth* should reflect this opportunity. One of Labour's missions is "Build more homes and help first-time buyers with 'first dibs' on new homes in their area" ([Link 3](#)). A recent survey by the National Housing Federation ([Link 1](#)) identified that "When asked if the government should prioritise building social housing, homes for sale or homes for private rent, over half of Brits said social housing (53%) compared to a fifth who said homes for sale (21%), and less than 1 in 10 who said homes for private rent (7%)"

More Social Housing

Dacorum Policy DM2 (Affordable Housing) ([Link 4](#)) – suggests 35% to 40% Social Housing is achievable - the proposed proportion of Social Housing is much lower in Berkhamsted and Tring. Housing developers clearly make more profit on three- and four-bedroom houses built on the outskirts of towns such as Berkhamsted or Tring. However, this does not meet the needs of local people.

Last year, under 7,000 social rent homes were built in the UK– the Local Government Association believes we should be building 150,000 council homes annually. ([Link 5](#)).. Shelter has identified that “in 2022 there were 1,206,376 households on social housing waiting lists in England. This is an increase of 5% since 2020 where there were 1,145,132 households on social housing waiting lists.” ([Link 6](#))

Build on Brownfield Sites , not Green Belt, arable farmland

The Strategic Housing Land Availability Assessment (SHLAA) within the *Strategy for Growth* is a technical exercise to determine the quantity and suitability of land potentially available for housing development – and therefore reflects the housing developers’ view of where they want to build – it has no citizen input. We believe the *Strategy for Growth* should engage more with the community to identify the demand for housing in Dacorum. The changes to the Dacorum *Strategy for Growth* have left a single site in Berkhamsted (Bk01) – which is both on Green Belt and is used for growing crops . The Dunsley Farm site in Tring is also on Green Belt land. The brownfield sites are surely more in line with planning objectives and, in our understanding, would be more popular with citizens – and give direct access to facilities in the centre of the town (shops, library, leisure facilities), particularly beneficial for older populations. We suggest, as some examples:

- Repurposing the Gossoms End / Billet Lane (Bk13) and Billet Lane (Jewson) (Bk11) site earmarked for another supermarket, to be used for high-density social housing (e.g. 3-4 story flats rather than houses.);
- Other brownfield sites in Berkhamsted such as the three sites near the river (Bk11, Bk09, Bk07) and the Civic Centre site (Bk12), are more appropriate for social housing, being close to bus routes. The flood risk for these sites is negligible ([Link 7](#));
- In Tring, the town centre site (Tr06) of 1 Hectare could provide 100 Social Housing dwellings close to amenities and transport, rather than another supermarket;
- Also in Tring, sites Miswell Lane (Tr05) and Icknield Way (Tr05) could deliver a further 100 Social Housing dwellings, before considering building on Green Belt at Dunsley Farm site. These sites could help to deliver a more ambitious proportion of affordable housing, more towards 80%.

It is well understood that higher housing densities can be achieved on brownfield sites. The CPRE document “Double the Density, Halve the Land Needed” ([Link 8](#)) shows many examples where 100 dwellings per hectare (or more) can be achieved The Bk01 Green Belt site is shown as delivering approximately 31 dwellings per hectare, only. The Tring Green Belt site, Tr01, also only achieves 31 dwellings per hectare.

Although build and utility connection costs will be higher for brownfield sites compared to Green Belt plots, these costs will be more than offset by future, less tangible benefits such as social and ecological wellbeing.

Social Housing should be close to Public Transport

Social Housing, in particular, should be close to public transport to guarantee mobility for people more likely not to own a car e.g. the A4251 in the case of Berkhamsted, where there is a reliable and viable bus service and ideally close to the railway station. Building on the far edges of town requires a long walk to the station or generates more traffic in the town centre (and more car parking) and risks social exclusion.

The South of Berkhamsted site (Bk01) is unsuited to transport of all types. It will require a costly new road from Chesham Road. However, much of the road traffic to and from Berkhamsted will go via Swing Gate Lane (past two existing schools) and the various Hall Park Roads rather than the new road link. (We already see gridlock near Thomas Coram school at school pick-up time.) Also, it is unlikely that a bus service to this site would be viable.

There is increasing evidence of the harm caused by traffic emissions on children – have these sites been evaluated based on the increased pollution close to local schools ?

More Detail and Commitment to Green Issues and Interventions

The South Berkhamsted site (Bk01) boundary appears on the map to extend right up to the A41 taking in the whole of Long Green woodland and the existing Long Green/Sugar Lane byway as well as the Gardenfield Lane bridlepath on the eastern boundary. Our members have raised many questions about this area – we question whether biodiversity and existing woodland issues are being taken seriously.

The plan must guarantee the protection of existing natural habitats, expansion of current ones or 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. e.g.: can a future development include a green corridor bridge (wildlife overpass) crossing the A41; or can current stretches of forest following the A41 be extended to mitigate air and sound pollution?

Although we do not support building on Green Belt land, if it is, a specific percentage (>50%) of the land selected to be built on should be “green infrastructures” ([Link 9](#)) and/or Sustainable Alternative Natural Green Spaces (SANG) and protection or expansion of existing semi natural ecosystems such as forest and hedgerows for Biodiversity Net Gain (BNG) ([Link 10](#)).

In Dunsley Farm in Tring, a large proportion of the land should be dedicated to green infrastructure, preservation of existing trees, forest and hedgerows. Residents of Tring also call for the creation of a community hub with a repair shed, exhibition space, community farm, workshops and more sports facilities and not only housing.

Our previous response to the *Strategy for Growth* ([Link 1](#)) stated that Environmental Sustainability should be given more focus. It is hard to see evidence that these issues have been taken into account in the revisions. We would like to see specific commitments to ensure that sustainability requirements for green construction are included in overall requirements during any procurement or selection of developers. For example:

- higher density housing would be able to better meet carbon objectives e.g. combined heating schemes or, for instance, assessing sites based on expected additional carbon emissions;
- the new developments must be carbon neutral from development to finished build. To achieve net zero emissions all new buildings must have maximum insulation, use sustainable materials as much as possible, only utilise electrical energy, must have rooftop solar panels installed at the time of construction, and must be fitted with efficient heating such as air source heat pumps;
- new housing should be efficient with built space and green outdoor space favouring 2 or 3 story construction of spacious flats with terrace rather than lots of small detached or

semi-detached houses with insufficient living space and small gardens; allowing large spaces for green infrastructure;

- 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;
- Passive House standards could be adopted. Passive House (link 8) is an innovative way to design homes, using far less energy than traditional houses. Using designs that draw on sunshine, shade and ventilation, they maintain a comfortable temperature without needing to use as much energy as a traditional home. Very good examples of sustainable and affordable housing in the UK can be seen in links 11-17.

More detail and commitment on Infrastructure definition

The plan is specific about housing numbers but vague on the infrastructure requirements. We are sceptical that much of the infrastructure will be delivered without more detail and a delivery strategy that ensures that Infrastructure is implemented in parallel, or before housing developments. What is the likelihood of the community hub and primary school being built on site Bk01?

For example, given the timescales and government targets for net zero,. it is expected that new developments will be powered by electricity and will require electric chargers for cars – have the increases in power consumption been identified?

Have the transport needs of residents of new developments been identified and can these be met with electrified public transport ?

Berkhamsted and Tring Labour Party

9th December 2023

Links:

1. <https://www.housing.org.uk/news-and-blogs/news/conservative-voters-support-building-social-housing-over-homes-for-sale/>
2. [Labour Response to Dacorum Plan 2022](#)
3. <https://labour.org.uk/missions>
4. https://www.dacorum.gov.uk/docs/default-source/strategic-planning/part-1---local-plan-emerging-strategy-for-growth-2020-2038---pages-1-to-187.pdf?sfvrsn=93bf0c9e_14
5. <https://www.local.gov.uk/topics/housing-and-planning/council-housing-100/future-council-housing>
6. https://england.shelter.org.uk/media/press_release/14000_social_homes_lost_last_year_as_over_a_million_homes_hold_sit_on_waiting_lists#:~:text=In%202021%2F22%207%2C528%20social%20rent%20homes%20were%20delivered%20in%20England
7. <https://flood-map-for-planning.service.gov.uk>
8. https://www.cprelondon.org.uk/wp-content/uploads/sites/10/2020/02/DoubleTheDensityHalveTheLandNeeded_1.pdf
9. <https://www.eea.europa.eu/themes/sustainability-transitions/urban-environment/urban-green-infrastructure/what-is-green-infrastructure>
10. [Suitable Alternative Natural Greenspace \(SANG\) and Biodiversity Net Gain \(BNG\) \(thelandtrust.org.uk\)](#)
11. [Passivhaus Institut \(passivehouse.com\); A Guide to Passive Houses: Designs, Costs and Benefits | OVO Energy](#)
12. [Case Studies – GHA Knowledge Base \(goodhomes.org.uk\)](#)
13. [Hope Rise | UKGBC](#)
14. [Hanham Hall | UKGBC](#)
15. [Agile Property – A New Way of Building Homes](#)
16. [Architype / The UK's Leading Passivhaus, Sustainable Architects](#)
17. [Woodstock North – GHA Knowledge Base \(goodhomes.org.uk\)](#)