



Dacorum Local Plan to 2041

Pre-Submission Stage Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Dacorum Local Plan to 2041

Please return by **12pm (noon)** on **Tuesday 17 December 2024** to Strategic Planning, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN or upload onto our consultation portal at letstalk.dacorum.gov.uk/make-a-representation

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title

First Name

Last Name

Job Title
(where relevant)

Organisation
(where relevant)

E-mail Address

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

2. Agent's Details (if applicable)

Part B – Please use a separate sheet for each representation

Name or Organisation: Greenway Primary & Nursery School

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst it is accepted that the proposed developments contained within the Local Plan will increase education needs (so far as they relate to Berkhamsted) there appears to be a lack of coherent strategic thinking thus making the proposals unsound. For example, it has been suggested that the proposed development at BK01 will result in a new primary school being built on site to service the 775 additional homes proposed. It should be noted that this proposal is far from sound for the following reasons:

1. Development BK01 is not in an easily accessible position being on the top of a ridge to the south of the linear town that is Berkhamsted which is situated in a valley with steep sides - currently the only proposed access routes in and out of BK01 are via one very minor road (Ashlyns Grove off Chesham Road) at one end of the town which will feed into the only narrow direct north/south road across the town. There are currently more than 2 forms of entry surplus within the town at Reception available in other local infant/junior/primary schools (which have very good reputations) spread out across both of the valley sides which will mean that some families on the proposed BK01 development may choose to send their children to those schools rather than the new local school thus causing yet more traffic movements in the town at peak hours.
2. To anyone who lives within the town the sustainable travel options proposed by Policy HC3, no matter how well intentioned, are just not feasible or practicable as noted within the Berkhamsted and Tring Sustainable Transport Study updated in September

2024 commissioned by Dacorum Borough Council in conjunction with Hertfordshire County Council (TRA02.1). Consequently, BK01's location and the build of a new primary school will likely put the already strained local road network under more pressure at school pick-up and drop off times and will do the very opposite of what is proposed within the Pre Submission Local Plan namely encouraging sustainable transport options.

3. In previous iterations of the Local Plan, it was agreed that the provision of secondary school places for the west side of the town including Northchurch was the priority – a major housing development with a new primary school on the south side of town adjacent to Ashlyns secondary school will make admission for Northchurch children to the school an impossibility and will again lead to more non sustainable traffic movements within and beyond the town as those students attempt to access secondary schools outside of the town in Tring, Hemel Hempstead or elsewhere.
4. If Hertfordshire County Council spend money in building a new primary school at BK01 there will be even less money available for the existing local schools currently already facing major financial issues.
5. Local schools are facing the worst recruitment crisis they have ever experienced – it has never been so bad. Staff simply cannot afford to live in the area – consideration must be given to the salaries payable to school staff (to include the cost of staffing wrap around care services) and whether they will actually be able to buy the promised “affordable” homes on the estate and live in the town, work carried out for Berkhamsted's own Town Plan suggests not. If Hertfordshire County Council cannot staff a new school, there is little point in building it.
6. Hertfordshire is in desperate need of further special educational needs provision along with the rest of the country. Whilst mention is made of this within the Pre Submission Local Plan it is of significance that there are no concrete proposals to address the reality of this – what is proposed is a primary school whose arrival will likely adversely impact all the other existing local schools.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Local Plan sound the removal of site BK01 will need to take place on the basis that it fails 'the suitability test' not least due to its adverse impact (by the build of another primary school) on the other educational settings within the town for the reasons stated above and also due to its consequential – and significant - impact on the already congested local road network and traffic within the town.

Specifically reference should be made to the Berkhamsted and Tring Sustainable Transport Study updated September 2024 which provides that '*Some characteristics of the town, most notably its location within a deep valley and more historic and physically constrained network of roads, will continue to create barriers for people making trips on foot or by bike Whilst as the crow-flies (developments on the ridge tops)... will be reasonably close to the town centre and railway station, the town's hilly terrain will also pose a significant challenge in encouraging sustainable travel behaviour.....travelling up or down a steep hill to/from the town centre or railway station will be unavoidable*'. Clearly the same rationale will apply to any parent attempting to take their child/ren to another school within (or outside the town) the town as to those attempting to access the railway station. The experts went on to report that to deal with all of the town's many identified travel issues was '*....notfeasible or cost effective*' .

Whilst accepting that there is a need for new housing it has to be in the right location – for all the reasons stated above building at BK01 is not the right location leaving aside the fact that it is Green Belt and currently provides valuable arable crop.

(Continue on a separate sheet /expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

NO **No**, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Pre-Submission period has ended. This data will be managed by a Programme

Officer who acts as the point of contact between the Council and the Inspector and respondents and the Inspector.

For more information on how we use your data – please see our privacy notice by clicking on this [link](#).

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online. All representations and related documents will be held by Dacorum Borough Council for a period of 6 months after the Local Plan to 2041 is adopted.

Part B – Please use a separate sheet for each representation

Name or Organisation: Greenway Primary & Nursery School

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	BK02, BK03 and BK04	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is: (Please tick as appropriate)

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

All comments set out below apply equally to sites BK02, BK03 and BK04. Specific reference needs to be made to a map of the area to understand the local road network and the constraints that it faces.

Greenway Primary & Nursery School is situated at the end of Crossways – a no through road accessed via Shootersway on the south side of the school site or by foot via local pathways on the north side of the site. Shootersway feeds into the main ridgetop junction coming from the A41 into Berkhamsted where it meets at traffic lights with Kings Road/Kingshill Way. The school is situated on the south side of the town effectively at the top of a steep hill. Children attending the school are aged 4-11 inclusive. Local practise, supported by the school's approach to transition, is that once children move into Year 5 (age 10) many parents start to allow them to walk to school on their own to get used to a little more independence before they start secondary school.

Whilst the school does its best to encourage sustainable travel to school, the realities of the topography of all ridge-top locations, taken together with modern family life mean that many children are dropped at school by car with their parents then travelling on to their places of work and/or the railway station on the north side of the town often via Kings Road. The roads around the school are extremely busy at peak drop off and pick up times and the pavements

(particularly along Shootersway) are narrow with little scope for widening them. When there are adverse weather conditions the road congestion is worse. Cycling is something that just does not happen as a matter of course in Berkhamsted due to the hilly terrain – this terrain is not going to change no matter how many cycle ways are introduced.

Following sites BK02 (British Film Institute) and BK03 (Haslam Playing Fields) having previously been removed from the Revised Strategy in March 2024, they have now been reinstated into the Pre Submission Local Plan despite the fact that they do not meet ‘the suitability test’ so far as they relate to access and transport. If the sites remain within the Local Plan and are developed, they will have a significant traffic impact on the town not least when coupled with the proposed BK01 development etc due to their poor access and the need for residents to rely on travel by car to access the town which whilst geographically close as the crow flies is at the bottom of a very steep hill. The impact on the roads around the school will be significant and specifically Shootersway.

Site BK04 (Haresfoot Campus) also fails ‘the suitability test’ so far as access and transport is concerned. If Berkhamsted School moves much of its sports and leisure facilities to an out of town site it is inconceivable how anything other than unsustainable transport measures (which are of course discouraged by the Pre Submission Local Plan) will be adopted to ensure that school children, staff and their parents will be able to reach it. Again, the impact on the roads around the school will be significant and specifically Shootersway.

We appreciate that it is not for this consultation to determine other applications for planning permission currently being considered but it is vital that the Planning Inspectorate note the impact of those applications should they be allowed – there is a need to think strategically rather than on a piecemeal basis.

As a Headteacher and Governing Body we are extremely concerned about the impact on the school community of the anticipated increase in traffic particularly along Shootersway as it feeds into the only direct north/south road across the town (Kings Road) should the developments anticipated by the Pre Submission Local Plan go through.

It is essential that decision makers are very clear of the following facts:

- The Denton (103 apartments) and Knightswood (17 apartments) at the top of Kings Road on the junction with Shootersway are currently largely empty but, when occupied, residents with cars will inevitably access the town via Kings Road adding to congestion of the local road network and specifically along Shootersway. It should also be noted that development of these relatively small-scale sites caused major congestion on local roads around schools (including impacting perceptions of pedestrian safety and the drive to encourage pupils to walk to school). On most school days over the last 18 months + this has led to standing traffic approaching the pedestrian/traffic lights on the Kingshill Way/Kings Road/Shootersway junction all the way back to the A41 roundabout, and on the worst days, to stationary traffic on the A41 in both directions as drivers seek to access town;

- BK02 and BK03 are set to provide for a further 200 houses all feeding from Kingshill Way/Shootersway into the narrow residential road that is Kings Road to access the town and can only add to the congestion along Shootersway;
- BK04 will ensure that yet more traffic is created as school pupils from Berkhamsted School are ferried backwards and forwards up Kings Road to reach the site from their centre of town based buildings clogging up the local road network even further and adding to congestion along Shootersway for those attempting to access either the town via Kings Road or to access the A41.
- the BK01 development south of Berkhamsted proposes that all traffic from the site wishing to access the town will be directed left from Ashlyns Grove and then funnelled along Kingshill Way and down Kings Road (and all traffic into the development to be directed right from Chesham Road ie traffic from town will largely come up Kings Road and along Kingshill Way to facilitate this) again adding to congestion along Shootersway;
- the proposals to turn Haresfoot Farm into a 61 property hamlet (24/01496/MFA) are still to be determined - its impact on local traffic is likely to be considerable, with all traffic wishing to access the town travelling along Kingshill Way and down Kings Road again adding to congestion backing up along Shootersway;
- Appendix 3 of the Pre Submission Local Plan provides for all of the site allocations and sites with planning permission that are less than one hectare in size which includes The Old Orchard also on Shootersway for 16 houses – again all traffic from this development will feed into Kings Road to access the town and cause further traffic chaos along Shootersway;
- the predatory planning application by Crest Nicholson of 90 houses along Shootersway which went out to consultation a few weeks ago will impact the local road network should it be allowed and built out.
- the proposals by the Kings Road Evangelical Church to build a vast new church approximately 50 metres from the main traffic lights in the centre of the town at the bottom of Kings Road with a 230 plus seater auditorium and effectively no onsite parking are also still to be determined – again its impact on local traffic is likely to be considerable as it is sited on the only direct north/south road cross the town ie Kings Road, should the development receive planning consent.

Shootersway is a narrow residential road with large private houses and gardens each side for much of its length and a narrow pavement along one side. At present traffic is often backing up beyond Shootersway Lane during peak hours and always when it is raining. The Berkhamsted and Tring Sustainable Transport Study updated in September 2024 (TRA02.1) notes the various minimal measures proposed to ease traffic along Shootersway including creating pavements on both sides of the road (albeit not the entire length of the road) and some crossing points. The reality of this is that what is already an exceptionally busy road at peak times will become even more congested as pedestrians zig zag their way across the road – it is not going to help

what will inevitably amount to a colossal increase in cars on the road. Bearing in mind that many of these pedestrians could be young children we would suggest that it is an 'accident waiting to happen'.

(Continue on a separate sheet /expand box if necessary)

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To make the Local Plan sound, the removal of sites BK02, BK03 and BK04 will need to take place on the basis that they fail 'the suitability test' due to their adverse impact on the already congested local road network and traffic within the town and the access issues that will be created by them.

Specifically reference should be made to the Berkhamsted and Tring Sustainable Transport Study updated September 2024 (TRA02.1) which provides that '*Some characteristics of the town, most notably its location within a deep valley and more historic and physically constrained network of roads, will continue to create barriers for people making trips on foot or by bike Whilst as the crow-flies (developments on the ridge tops)... will be reasonably close to the town centre and railway station, the town's hilly terrain will also pose a significant challenge in encouraging sustainable travel behaviour.....travelling up or down a steep hill to/from the town centre or railway station will be unavoidable*'. The experts went on to report that to deal with all of the town's many identified travel issues was '*....notfeasible or cost effective*' .

Greenway Primary & Nursery School is effectively at the top of one of the steep hills coming up from the town centre via Kings Road. Kings Road is a narrow residential road with on street parking along one side causing traffic on that side to have to move over into the oncoming line of traffic. It is used by supermarket delivery lorries and innumerable school coaches accessing both Berkhamsted School and Chesham Grammar School on a daily basis during term time. The pavement is exceptionally narrow in parts.

Both the Governing Body and I want to ensure that all our families and children are able to get to and from school safely. As such the site allocations proposed at BK02, BK03 and BK04 under the Pre Submission Local Plan have to be considered in terms of their suitability for transport

and access and the only conclusion that can be reached is that they are simply not appropriate for either transport or access for all the reasons stated above.

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