

Date:
Your Ref. CS/M1/10023
Our Ref: 19.2.2
Contact: Heather Overhead
E-mail: Heather.overhead@dacorum.gov.uk
Directline: 01442 228663
Fax: 01442 228771

Mr Ian Kemp
36 Campbell Street
Rugby
Warwickshire
CV21 2HY



**BOROUGH
COUNCIL**

Civic Centre
Hemel Hempstead
HP1 1HH

(01442) 228000 Switchboard
(01442) 228656 Minicom
DX 8804 Hemel Hempstead

CS/M1/ 10023

Dear Mr Kemp,

THREE RIVERS DISTRICT COUNCIL CORE STRATEGY EXAMINATION

Thank you for sending me the relevant information regarding the Three Rivers District Council (TRDC) Core Strategy Examination.

Officers from the two Councils (Dacorum Borough Council (DBC) and TRDC) have had productive discussions regarding the issues at the heart of DBC's representations to the proposed submission draft of the Core Strategy. These discussions have resulted in the submission of a Statement of Common Ground agreed between the two Councils and submitted to you by Three Rivers District Council. Despite these productive discussions, there are still aspects of DBC's representations that DBC would like to bring to the Inspector's attention. These relate to Matter 1: overall spatial strategy and space shaping policies.

Matter 1: Place – Shaping Policies PSP1, PSP2, PSP3, PSP4

1.15 PSP3 (h) and (i) Have the effects of future development in Kings Langley on school and other infrastructure been considered in sufficient detail to demonstrate that the proposed level of housing growth can be delivered?

I refer to the previous representations submitted by DBC (July 2010) to the proposed submission version of the Three Rivers District Core Strategy. These state that DBC considers Policy PSP3 to be unsound because it is neither justified nor effective. The main reason is the failure of the Core Strategy to recognise the need for additional primary school provision arising from the level of development proposed in Kings Langley. DBC understands that although a new primary school at Kings Langley has been considered by the County Council, it is now considered that pressure on Kings Langley primary school can best be alleviated by the provision of new primary schools in Abbots Langley and in south Hemel Hempstead. Although policies PSP2 and PSP3 state that



INVESTOR IN PEOPLE

development will *'improve provision of access to services and facilities to meet future demands specifically through: vi Expansion of school provision to meet identified needs'*, DBC do not consider that this sufficiently acknowledges the need arising from the cumulative level of development proposed at Kings Langley. Nor does it sufficiently explain TRDC's proposed approach to enabling new primary school provision in the appropriate location and at the appropriate time.

- DBC consider that this causes the Core Strategy to be unjustified because it fails to show how the policies and proposals help to ensure that the social, environmental, economic and resource use implications of sustainability are achieved.
- DBC consider that this causes the Core Strategy to be ineffective for two reasons. Firstly, although the infrastructure delivery plan is sound, its conclusions are not well reflected in the Core Strategy. Secondly, it shows a lack of coherence with the strategy of a neighbouring authority (Dacorum). The Dacorum Core Strategy (Draft for Consultation, November 2010) recognises the need for additional provision of educational facilities, including broad locations where possible. It also contains place strategies for the towns and large villages in Dacorum borough. The Council do not propose any development in the Green Belt around the village, nor does it propose changing the boundary of the Green Belt around Kings Langley. The development of a primary school in the Green Belt around Kings Langley would therefore be contrary to the Dacorum Core Strategy.

DBC consider that the TRDC Core Strategy can be made sound by recognising the aforementioned need for additional primary school provision and by setting out how any shortfall in primary school capacity will be addressed.

In accordance with the guidance note from the Inspector, DBC suggest how this recognition could be reflected within the Core Strategy, although it is considered that TRDC are best placed to advise on the most appropriate wording.

It is suggested that the following be incorporated into policies PSP2 PSP3 after criterion (g) in each policy:

- Contribute to the development of a new primary school in the Abbots Langley area to meet the needs arising from the cumulative level of development in the area. The location and specific details of the school will be included in the Site Allocations Document.

DBC have not suggested how the TRDC Core Strategy should set how a shortfall in primary school capacity should be addressed, because it considers that TRDC are best placed to develop and explain their approach.

DBC recognise that the reconciliation of the outstanding matters is in part dependant on timely advice from the Local Education Authority regarding the need for additional educational facilities over a much wider area than a single Local Planning Authority.

Yours Sincerely

Heather Overhead
Strategic Planning and Regeneration Officer
(Strategic Planning)