

Objection to Planning Application:

24/02705/MOA

Construction of a nursing home (Use Class C2) of up to 67 bedrooms for dementia care with separate bin/cycle store building, electricity substation and associated works and landscaping with all matters reserved except for the construction of access junction and road on Land at Bulbourne Wood, New Road, Northchurch, Berkhamsted.

Introduction

- 1.1. This letter of objection is submitted by Govresources Ltd, on behalf of Northchurch Parish Council.
- 1.2. The application for a C2 Nursing Home to include up to 67 bedrooms should be refused based on inappropriate development in the Green Belt without identification of very special circumstance that would make it appropriate.
- 1.3. The site comprises woodland protected by a Tree Preservation Order (438), with ecological value and its surroundings are predominantly rural. Additionally, it is situated within and forms part of the wildlife corridor which runs from the canal up New Road to Northchurch Common and onward to the Chilterns Beechwoods SAC.
- 1.4. The design has failed to protect the countryside above the site from the impact of development in the woodland, has not considered the local vernacular and does not resolve the siting of a care home with the appropriate level of natural light in a woodland setting.
- 1.5. Considerable harm would be caused to the Green Belt, along with harm to the Chilterns National Landscape (AONB), and views from Northchurch Common and from the nearby surrounding hillsides. No benefits have been identified that would balance the harm that would be caused.
- 1.6. The site is not suitably located for a dementia care home or its future residents. It is the wrong facility on the wrong site.
- 1.7. The application should be refused.

Site and Surroundings

- 1.8. The application site is outside the settlement boundary of Northchurch and Berkhamsted, as shown on the current Local Plan and the proposal is to maintain that boundary in the local plan currently being prepared (Reg 19). The land lies within the Chilterns National Landscape and the Chilterns Beechwoods Special Areas of Conservation (SAC) 500m Exclusion Zone. It is proposed to be allocated in the Reg 19 version of the Dacorum Local

Plan to 2041 as Suitable Alternative Natural Greenspace, to relieve the pressure of visitors on the SAC.

- 1.9. The Planning Statement describes the surrounding area as being “predominantly residential in character”, but the site context photos in section 2.2 of the Design and Access Statement show that in all but the east and south easterly direction, the site surroundings are predominantly rural (see Extract from Google Earth attached). To the northeast is a paddock, to the north west lies agricultural land in arable production, to the south west lie allotments and behind those, Sunnyside Nursery. Sunnyside is run by the Sunnyside Rural Trust, a thriving charity and social enterprise helping people acquire skills in a variety of rural activities. The allotments and nursery site are separated from the edge of the town by the railway line and the Grand Union Canal. The development is inappropriate in this rural setting.
- 1.10. Homes in Northchurch on the north west side of New Road stop at the canal other than the old Lock Keepers Cottage (49 New Road). Homes in Northchurch on the south west side of New Road extends up to the boundary of the application site, comprising detached properties, including bungalows with large gardens. Berkhamsted has grown beyond this point with three storey terraces looking over New Road but with no access to it. This is undoubtedly to prevent further pressure on the narrow road and old single track bridge over the canal.
- 1.11. It is important that the Green Belt fulfils its purpose of preventing further urban sprawl from Berkhamsted into Northchurch and should not cross to the western side of New Road, encroaching into the open countryside.
- 1.12. The special character and community of Northchurch should be preserved so that it does not become a suburb of Berkhamsted. The village community, the semi-rural character and distinct appearance of Northchurch should be retained, and the separation of the village from Berkhamsted is essential to that aim.

Design

- 1.13. The visuals provided of the design of the unit indicate there is no attempt to respond to local character. The current size and height of the building, and the clearance of woodland necessary to accommodate it will be seen as an intrusive visible form from the higher land to the north and Northchurch Common. Its location in established woodland will also make it difficult to balance the need for natural light for residents and the ecological damage to the woodland. Considering the views of the Council’s Tree and Woodland Team and the Urban Design Team at Dacorum Borough Council, this balance has not been effectively achieved. The care home will create light pollution spilling from the large window openings and ancillary lighting in the grounds, impacting the woodland ecology and the surrounding area.
- 1.14. Twenty four parking spaces are provided on site for residents and visitors to the proposed 67 bed space nursing home, supported by 94 full-time staff. Despite Hertfordshire County Council going on record to say that parking provision is acceptable, the reality of the travel plan being able to work effectively, particularly for staff working at night is very dubious. Bus provision is patchy and despite Berkhamsted having a railway station, the station is a mile and a half from the proposed care home via the shortest route. The Parking Standards Supplementary Document for Dacorum (2020) requires 17 of those 24 spaces at 0.25 car parking spaces per resident bed space. This leaves only 7 spaces for a full-time staff of 94.

This number would surely be inadequate particularly when two shifts have to be on site for patient hand overs, and restrictive in terms of staff safety at night or early morning given relative remoteness of the site from transport links and likely balance towards female staffing.

Green Belt & Chilterns National Landscape

- 1.15. The Green Belt credentials of this site are clear. The land lies in parcel BK-A2 identified in the Stage 2 Green Belt Review and Landscape Appraisal (2016). The parcel is described as 'strongly' contributing to Green Belt purposes and is safeguarding the countryside from encroachment. Dacorum BC have upheld that conclusion. The site continued to be shown as Green Belt in Dacorum's Revised Strategy for Growth and remains in the Green Belt in the Reg 19 Local Plan for which the consultation has concluded.
- 1.16. In the applicants Planning Statement they assess the harm to the Green Belt as only 'limited harm'. However, the development is inappropriate, causing substantial harm. Despite the proposal including new tree planting and new habitat creation, the length of time that it would take to achieve Biodiversity Net Gain is considerable and reduces this benefit being weighed in favour of the development, by the applicant.
- 1.17. Green Belt parcel BK-A2 is heavily wooded and whereas the applicant considers this an advantage compared with surrounding land which is open, woodland is part of the feeling of the openness of the Green Belt and should not be used as an excuse for the land to be built on. The openness will be reduced by a substantial building with a considerable amount of hardstanding, including the parking spaces, on the long and winding drive. The increase in activity, which is virtually nil now, would also be a negative impact.
- 1.18. The harm the development will cause to the special qualities of the Chilterns National Landscape (AONB), also weigh heavily against it. The Chilterns AONB Management Plan 2019-2024 states:
DP5 Require a Landscape and Visual Impact Assessment that meets the standards in the GLVIA52 latest edition for developments in the AONB or affecting its setting. All but the smallest projects should be accompanied by a LVIA to ensure that impacts are assessed and understood. This must address effects on both the protected landscape as a resource in its own right (whether visible or not), and effects on views and visual amenity (as experienced by people).
- 1.19. The site will be clearly visible from higher elevations on both sides of the valley, from other parts of the AONB and from the Chiltern Beechwoods SAC itself. The impact on residences both adjacent to the site and on the other side of the valley is understated, particularly since screening provided by vegetation during winter months is very limited.
- 1.20. The applicant's conclusion that there is only limited weight against the development is quite clearly wrong.

A C2 Use for Dementia Care on this Site

- 1.21. An argument is put forward by the applicant that the substantial benefits of the C2 use would outweigh the harm the development will cause. There is no doubt that across the Borough, the need for more care facilities will increase. Dacorum Borough Council's pre-application response considers the local need for care provision and points out that there are other facilities being built nearby. In addition, there are already 26 operational facilities

in a five-mile radius of this site. The improvement and/or enlargement of these existing facilities may be more appropriate than a new build in the Green Belt.

- 1.22. Returning to the applicants Planning Statement, it argues that there are several benefits of allowing the development on this site. An economic benefit is supposedly going to boost spending in the local economy, but spending by whom? It is unlikely that occupants of an acute dementia care facility would be able to negotiate the walk out of the site and along the narrow footpath beside a narrow road, over the river and into Northchurch to do their shopping or visit the pub, half a mile to the Tesco Express or George and Dragon.
- 1.23. Another of the supposed benefits is that the number of recreational visits to the protected Chilterns Beechwoods SAC will be reduced as local people can use the proposed formalised woodland walk. The development would supposedly contribute to protecting this important habitat. This is a nice idea, but the application is for a care home and not a SANG. The creation of a SANG should conform to a number of criteria set out by [Natural England](#), which the woodland walk will not do. There will be no parking provision for visitors to the woodland so its use would be for residents living locally only (defined by Natural England as living within 400m). The attached extract from Google Earth shows only a few homes within that radius (those homes also being very close to Northchurch Common which is a more easily accessible alternative).
- 1.24. Also, to attract visitors to a SANG, routes within the site should be between 2.3-2.5 km for a short path. The nature of short paths particularly should be perceived as safe by users and should be relatively open with no trees or scrub. Furthermore, the woodland is in multiple ownerships creating a mosaic of small plots which will not be accessible. We conclude that this proposed benefit should be discounted. The application site within which the woodland walk is proposed is only 1.27 hectares, with more than half of the woodland being in 'other' ownership.
- 1.25. Interestingly, Natural England has confirmed to the applicant that a planning condition limiting the occupancy of the development to acute dementia sufferers, would not require mitigation for adverse effects on the Chilterns Beechwoods Special Area of Conservation, as it would not represent additional recreational pressure. The Parish Council queries whether the applicant can prove the identified need for dementia specific nursing care in Northchurch, such that they would accept planning permission with a condition to remain specifically for that purpose.
- 1.26. We believe that there is no argument put forward to support the location of a dementia care home on this site.

Other Comments

- 1.27. Several other comments have been raised by Northchurch residents. These highlight further that the site is unsuitable for development. The road is narrow with an even narrower footway, and the old bridge over the canal is single track. The development will create additional traffic on New Road, the single track section over the canal, and worsen the congested junction of New Road and Northchurch High Street. This junction is already a concern as it creates pollution from queueing traffic close to St Mary's Primary School.
- 1.28. This edge of settlement location would mean that residents of the dementia care home would effectively be isolated from Northchurch and Berkhamsted, presenting no options for occupants to integrate into the local community and removing any independence they may

wish to have. The woodland location could present a danger as could the access onto a dangerous narrow road. It raises the question of whether the applicant has properly considered the suitability of the location.

- 1.29. The road conditions question the reliability of quick access for emergency services at peak times, particularly the start and end of school day.
- 1.30. Furthermore, there is no main drainage on New Road requiring a substantial operational development to provide draining for the proposed care home.
- 1.31. The disruption to residents of Northchurch, while the development takes place is a major concern. If this were a brownfield site, for example, a condition would be written into a planning permission requiring all operational works, construction traffic and materials to be always held on sites with no queueing for the site on New Road. However, such a condition in this instance would surely result in the destruction of considerably more of the woodland environment than the land to be taken up by the building.

Summary and Conclusions

- 1.32. The applicants argue that the site is sustainably located, but we, the Parish Council, and residents of Northchurch and Berkhamsted believe that it is an inappropriate location for a care facility.
- 1.33. There is also no overriding argument made by the applicant that it is necessary to locate the care facility on this site, or that there are very special reasons for doing so.
- 1.34. The conclusions of our submission are in agreement with the updated pre-application advice issued by the LPA:
 - The development amounts to inappropriate development in the Green Belt/Chilterns National Landscape
 - Very special circumstances have not been proven by the applicant to justify the proposals.
- 1.35. Our conclusion is that in the balancing exercise between the clearly identified harm and the dubious proposed benefits, the weight falls firmly on the side that says that the proposal will cause considerable harm to the Green Belt/Chilterns National Landscape, and the ecological value of the woodland.
- 1.36. The planning application should be refused without invitation to amend the proposal to make it acceptable.

Extract from Google Earth – homes within a 400m radius of the site

