

Berkhamsted Residents' Action Group

**Statements
to the
Independent Examination
into
Dacorum Borough Council
Core Strategy**

18 September 2012

Issue 2: The Distribution of Development (settlement hierarchy) and the Green Belt

As per our earlier response to the Core Strategy paragraph 1.8, and policy CS1, in the view of BRAG the Settlement Hierarchy is eminently reasonable and BRAG supports DBC in resisting pressure from developers to remove Berkhamsted from the same classification as Tring and thus allow the town to be used as a "strategic development opportunity".

Berkhamsted and Tring are ancient market towns of a very different character from Hemel Hempstead, which is a Mark 1 New Town. Any infilling in Berkhamsted and Tring has to be handled with sensitivity because of the architectural heritage and lack of infrastructure to cope with large scale development, not to mention being virtually surrounded by Green Belt and the Chilterns AONB, which is of intrinsic value to wildlife and of great recreational value to residents and visitors.

It is imperative to protect the nature and character of both Market Towns, while it is logical that the growth in Dacorum will be centred in Hemel Hempstead (see BRAG response to the Core Strategy paragraph 3.2).

This Settlement Hierarchy helps accomplish these aims.

It is BRAG's view that DBC's Sustainability Appraisal supports the chosen hierarchy and broadly agrees that the site selection process is based on appropriate criteria. BRAG does, however, find some of the assessments in the Addendum to the SA report to be misguided.

Our main objection would be in "Sustainable Location" criteria. We argue that it is not enough for a landowner to merely suggest that community facilities and shops will be provided within a development without any realistic assessment being made of the location of such facilities in relation to existing facilities or to their likely economic sustainability, when considering the Significance Assessment measure.

Nationally it is common place for such promises of facilities not to materialise. But with regards to Berkhamsted specifically, there is overwhelming historical evidence that shops/amenities provided at or close to ridge top locations are not sustainable regardless of the number dwellings close by.

Shops that have existed or were planned in such places are now long since closed. Despite having a seemingly adequate catchment on paper, they were simply not economically sustainable. In contrast, Berkhamsted High Street is positively thriving relative to the present general economic climate which demonstrates the importance of footfall to retailers and residents preference for shops in the valley and on the level. They will not change their habits because a developer says they will. In Appendix 2 we offer three independent letters assessing the viability of such developments.

We highlight the above because in the summary of assessment results on site 2.5, Land south of Berkhamsted, it is assumed that new community facilities and shops will be provided and the impact that location and topography have on car usage and thus the site's

sustainability ignored. A more realistic Significance Assessment of this site's "Sustainable Location " criteria would be "? Uncertain ", at best; more likely "x Unsustainable".

However, BRAG does accept that DBC's selection process is more transparent and robust than some devised by land owners promoting their land for development. BRAG analyses one such methodology within Issue 11.

BRAG strongly supports the general position taken by DBC in defending the Green Belt surrounding Berkhamsted from encroachment and particularly supports MC82 strengthening paragraph 21.6.

The Core Strategy follows the principles relating to the Green Belt restated in the Government's recently published NPPF. The five purposes served by the Green Belt are of particular importance when considering the further development of Berkhamsted.

BRAG also notes that the 12 core principles which planning should follow includes: "to take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it".

However, BRAG considers that the inclusion of Hanburys as a Local Allocation (LA4) in the Core Strategy is unsound, unjustified and indeed illogical given MC82. This also applies to the addition of Old Orchard in the site description of LA4.

Although DBC states that the principle of a green swathe between the town and the A41 is accepted, the Core Strategy claims that the inclusion of Hanburys (LA4) is required to help meet local housing needs arising within Berkhamsted and a change of Green Belt boundary is justified in this case. BRAG disputed those claimed local housing needs in its responses to the Core Strategy and expands those arguments within Issue 6.

There are no exceptional circumstances to justify inclusion of Hanburys/Old Orchard as a Local Allocation. Doing so will set a precedent for further development between Shootersway and the A41 and should not be permitted.

These are ridge top locations at some distance from the town centre. Local residents are already subject to high traffic volumes along Shootersway and the proposed addition of a roundabout at the junction with Kings Road will do little to mitigate this. The addition of 60+ houses generating around 420 vehicle movements per day, exiting onto this road, as well as the extra traffic generated by SS1, will make a further negative impact on their quality of life.

BRAG wishes to draw to the attention of the Inspector a number of similar applications made by owners of land lying between Shootersway and the A41 by-pass that have been rejected due their impact on the Green Belt (see Appendix 3).

BRAG considers that the Core Strategy is sound and justified in refusing to accept major development on land in South Berkhamsted. Proposals to build at South Berkhamsted have been considered a number of times in recent years following applications from the land owners and have consistently been rejected.

Berkhamsted residents were therefore greatly concerned to discover that there would be yet another attempt to capitalise on the ownership of this farmland and that the land owners, GUI, - knowing that the Town Council and DBC did not support their plans - were intending from the outset to appeal to the Inspector to over-ride the wishes of the local community who want to safeguard their Green Belt.

In their planning documents, GUI use a number of 'quotes' from the 1996 Dacorum Borough Local Plan Inquiry Inspector's Report to support their case, for example:

- GUI Planning Document s2.3: *"acceptance from the Inspector...that land in this area has merit as a housing allocation' and would have released it if the demand had been there"*.
- At s2.5 GUI claims that the Inspector supported the land as an urban extension. They suggest because it is not of high landscape value it should not be Green Belt. S5.43 repeats the claim that the land has been considered suitable for development under a previous assessment.
- In their response to the Core Strategy Pre-Submission at p21 GUI claims that *"Land south of Berkhamsted can be released without a significant impact on the integrity of the designation or the environment"*.

BRAG obtained copies of the Inspector's Report and found that GUI had been highly selective in the phrases quoted in order to support their position. In full context, the previous Inspector's report fully rejected GUI's predecessor's attempts to have the land redesignated for residential purposes (see Appendix 4).

Appendix 2

Letters regarding proposed village amenities
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Mr Antony Harbridge
Chairman
BRAG
20 Hall Park Gate
Berkhamsted HP4 2NJ

Pressmead
13 Hall Park Gate
Berkhamsted
HP4 2 NL
29 June 2012

Dear Sir,

GUI South Berkhamsted Concept

I write as a Chartered Surveyor with over 40 years experience of commercial, retail and leisure property. This particular submission to the Public Examination into the Dacorum Core Strategy, relates to the intention by GUI to establish a “village centre” as part of their South Berkhamsted development proposals.

The centre, adjacent to Swing Gate Lane, would provide a convenience store, café, public house, medical centre and offices. It is presented as part of a package of ‘community benefits’, with the stated intention that ultimately the centre would pass into public ownership. This latter aspect makes it particularly important that the viability of these proposals is understood.

In forming an opinion of their suitability and viability I have discussed the proposed uses informally with two local commercial property advisers, namely Freeth Melhuish and Aitchison Rafferty, as well as drawing on my own experience.

The majority of commercial, retail and leisure property is located in Berkhamsted’s town centre. Exceptions include offices at Ashlyns Hall and convenience stores at Northchurch, Charles Street and Westfield Road. In recent years similar stores in the High Street, Woodlands Avenue and Gravel Path have closed as have pubs at Northchurch, Gossoms End and Berkhamsted High Street. There has been growth in restaurants and coffee shops, all of which are centrally located and demonstrate the increasing dominance of national chains.

Owners and operators of the proposed retail and leisure properties assess visibility, accessibility, parking, footfall and catchment size and characteristics. Prominence and high visibility are essential and this location fails on that assessment alone. There is growth in the restaurant/café/coffee shop sector but Berkhamsted centre provides 9 cafes or coffee shops and 10 public houses.

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My professional experience includes assessing site viability for pubs and pub restaurants and Costa style coffee shops. This location lacks visibility to passing vehicular and foot traffic, and therefore despite the proposed increase in population in the immediate vicinity there is insufficient demand to sustain these uses.

The property advisers I have spoken to have not studied the development proposals in any detail, but confirmed that these uses require central locations with good visibility for potential customers, and concluded that they are probably included as a requirement of the local planning authority, rather than as a viable development proposition.

It is my opinion that this aspect of GUI's plans for the area are not viable or sustainable and furthermore if built and subsequently transferred to local community ownership (GUI's stated intention), far from being a benefit, will become a burden on the community. As GUI do not see this as a long term property investment opportunity, they will be well aware of this; nevertheless they include them as part of a package of 'community benefits' in support of their attempt to secure a residential consent on the balance of their landholdings.

Savills, on behalf of GUI maintain that the critical mass of their client's proposals will enable investment into improved and new social and transport infrastructure. It is understood that their proposed new medical centre is not required. This would leave the proposed office content of the centre to stand alone. I have not considered the viability of stand alone offices, but this does seem to be an unusual location and unlikely.

Overall there must be considerable doubt as to whether any of the promised improved or new social infrastructure will be provided.

Yours Faithfully



H R Siegle FRICS

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Peter J. Brown FRICS
Chartered Surveyor

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Greenwood
Gravel Path
Berkhamsted
Herts
HP4 2PQ

Mr. Antony Harbridge
Chairman
Berkhamsted Residents Action Group
20 Hall Park Gate
Berkhamsted
Herts.

6 March 2012

Dear Mr Harbridge,

Proposed development at South Berkhamsted

I refer to the proposal by GUI for large scale predominantly residential development of the area between Upper Hall Park and the Berkhamsted by-pass. I understand that this is to be examined at the inquiry to be held later this year into the proposed Core Strategy, produced by Dacorum Borough Council.

I write to offer my views as a detached observer of large scale planning proposals in the town, rather than as a local resident likely to be directly affected by the proposal, as I live on the other side of the valley some distance away.

My interest in such schemes springs from my career as a Chartered Surveyor over many years, principally engaged in the commercial and leisure sector of the property industry, which informs my views on proposals of this nature, and this coupled with having been a resident of the town for a long period has attracted my attention to this application.

I believe that there is a substantial body of opinion against the proposal, but my interest is drawn in particular to the proposal to incorporate a local neighbourhood centre within the scheme, and my comments are mainly confined to this. However I do have a reservation about the size of the scheme, in that some 800 dwellings, which must increase the population of the town by at least 2000 inhabitants, must surely have an adverse impact on the town's infrastructure, which is recognised as being already inadequate for the current population size.

From my impartial viewpoint, there do appear to be some serious flaws in the thinking behind the neighbourhood centre element of the scheme.

I question the developer's assertion that the neighbourhood centre 'presents the opportunity to extend and enhance the existing High Street retail facilities.....'
It is a fact that there are empty shops in the High Street at present, and most property experts expect a contraction of retail businesses due to changed shopping patterns brought about by economic and other factors, such as an increasing trend towards internet shopping. While the nature of a convenience store is just that, and unlikely to

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be affected as much as many types of retailers by internet shopping, it is the case that a convenience store in the High Street closed a while ago.

I would question whether there is a sustainable demand for a convenience store in this location.

I also note the proposal to include a public house in the 'neighbourhood centre' area. My experience of 'estate' or what are otherwise known as 'community' pubs is that they invariably prove to be unsustainable in the medium term, and I have witnessed many that have closed in these sorts of locations, and become a boarded up eyesore, bringing an air of deprivation to their surroundings.

Many more pubs are closing than are being opened, and the new ones are in prominent locations, and usually of substantial size, enabling them to serve meals as well as drinks. Community pubs, which are heavily dependant on drinks trade, are somewhat outdated, and few pub operators will wish to invest in one.

I make these comments from the perspective of having been involved over many years at a senior level in the property department of a large leisure operator with a very substantial public house portfolio, so my views are made with considerable in depth knowledge of the viability of public houses.

I further notice that it is proposed to include some 1200 sq. metres of offices – again, I really question the viability of this, given the amount of office space available in the town. This amount of office space, if tenants were found, would inevitably result in an increase in car borne traffic to an area where the existing and proposed highway provision will result in some local feeder roads becoming extremely busy.

Overall, it seems to me to be ill considered to propose a neighbourhood centre which contains a convenience store, a café and a public house. If any one of these were to fail, it would inevitably have a knock on detrimental effect on the viability of the others, and one could imagine that the centre might easily become a somewhat neglected and sterile eyesore in the not too distant future.

I am not sure that the developer is wholeheartedly convinced of the viability of the 'neighbourhood centre', and there are indeed references in the 'small print' to suggest that some at least of the elements may not be necessary. If I were cynical, I might think that this idea has been included in order to make the scheme seem more attractive. In reality, for the reasons outlined, I think it is likely to be unsustainable from the outset, and a promised 'benefit' which the developer may well wish to unburden itself from at an early stage.

I offer these views for your consideration, and I do hope that the whole ethos of the neighbourhood centre here is subject to rigorous challenge at a public enquiry.

Yours sincerely,



Peter Brown FRICS

Appendix 2

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Mr Antony Harbridge
Chairman
BRAG
20 Hall Park Gate
Berkhamsted HP4 2NJ

Pressmead
13 Hall Park Gate
Berkhamsted
HP4 2 NL
14 September 2012

Dear Mr Harbridge,
GUI South Berkhamsted Concept

I refer to my letter of 29 June 2012 and our subsequent conversation in which you asked me if I had any market evidence to back up the professional opinions you have received on the viability of the proposed 'village centre'; part of the development proposals for the land at South Berkhamsted.

All operators of coffee bars, new pubs and convenience stores will make a market assessment of a site which will include an examination of the catchment area, its size and socio-economic profile; competition and location factors, including access, prominence and visibility, existing and potential footfall and the opportunity for passing trade. The major players have location planning teams that assess each site using financial business models to indicate levels of profitability.

In respect of convenience stores I understand Tesco and Sainsbury have weekly sales targets of £40-50,000 for new stores in London and the South East. Waitrose are also active in this market and I have discussed this specific location with one of their acquisition managers.

His conclusion was that the site is not nearly strong enough to support the level of turnover required and pointed out that the catchment area is at the most half of what would normally be expected, as the land to the east and south is open countryside. The additional residents resulting from the proposed residential development would not have a significant impact on this analysis.

You also asked me to comment further on the proposed stand-alone offices in the 'village centre' given that the nearby Listed Ashlyns Hall is also in this use and at a location remote from the town centre. I suggest there is a vast difference between a careful adaptation of a complex of historic buildings in a parkland/garden setting, for offices and other business uses, which are sustaining the buildings through economic use,

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and developing a new office building in the middle of a new residential estate. The latter would be a clear breach of Green Belt policy and I cannot see how it would be acceptable in planning terms even if it were a viable proposition.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'H R Siegle', with a long, sweeping flourish extending to the right.

H R Siegle FRICS

Appendix 3

Extracts from Dacorum Borough Local Plan Inquiry

Inspector's Report- August 2002

4.25.1. *Land to the rear of 13-17 Oakwood Road -*

The objection site is a narrow strip of uncultivated land of some 15 metres or so in width, which lies between the rear boundaries of 13-17 Oakwood Road and the northern embankment of the A41. Dennys Lane runs along its eastern boundary.

4.25.3. I appreciate that this strip of land has been left over following the construction of the adjacent bypass. However, the land is prominent from the A41 and, in my view, it contributes significantly to the general rural setting of the bypass. The site is clearly separated from the adjoining housing by a reasonably dense belt of vegetation at this point. Development of the land would extend the built-up area of Berkhamsted beyond this well-defined boundary right up to the northern edge of the deep cutting in which the bypass is located. In view of this I consider that any development on this site would visually encroach on the open countryside to the south of the road. I find, therefore, that the land continues to serve a valid Green Belt purpose. I am not satisfied that the circumstances outlined by the objectors are sufficiently exceptional to warrant the release of this land from the Green Belt. Accordingly I recommend that no modification should be made to the Plan in answer to objections 237 & 349.

4.25.4. *Land to the rear of 18-23 Oakwood Road -*

This wedge shaped piece of land lies immediately to the west of the previous site and is located between the rear gardens of 18 and 22 Oakwood Road and the A41 embankment. When originally designated, the boundary followed an existing hedge line and the edge of a dell. The dell has since been infilled and the hedge removed. The land now forms part of the rear gardens of 18 to 22 Oakwood.....

4.25.5. As I have already indicated I see no need for this land to be released from the Green Belt to meet housing needs during the Plan period. Neither in my view would the release of this land be preferable to the release of the sites proposed in the Plan owing to its more remote location. I have therefore considered whether the construction of the A41, the infilling of the dell, the removal of the original hedge line, the raising of the height of the land and the new planting along the bypass are sufficient in this case to amount to the exceptional circumstances necessary to justify revisions to established Green Belt boundaries.

4.25.6. I accept that the infilling of the dell and the removal of the adjoining hedge means that a readily recognisable feature no longer marks the original boundary as recommended by PPG2. However, while the embankment of the A41, together with the new planting, would undoubtedly form a better defined boundary I do not consider that this is sufficient reason, in itself, to warrant amending the boundary. To accept the removal of existing

features as adequate justification for modifying an established Green Belt boundary would, in my view, be likely to encourage other landowners to take similar action.

4.25.7. Although the land is not visible when approaching along the A41 from the west, due to its elevated position, it is more prominent when viewed from the east. Although the land now forms part of the gardens to residential properties, the actual dwellings are set well back from the bypass. The long open rear gardens, in my opinion, help to safeguard the generally rural setting of the road. Development of this site would not only significantly extend the built up area of Berkhamsted towards the bypass but it would also visually intrude into the open countryside to the south and east.

4.25.8. The gap between the A41 and the built-up edge of Berkhamsted is very narrow at this point. I find, therefore, the Green Belt is particularly sensitive in this location. I am concerned that if this land was released the Council would subsequently face pressure to release land to the east and west of it, which I consider they would find difficult to resist. In my view this would cause significant harm to the purposes for which the land was designated as Green Belt. I am not satisfied that the circumstances advanced by the objectors are sufficient to outweigh this harm. I, therefore, recommend that no modification should be made to the Plan in response to objections 238 and 4858L.

4.25.9. *Land to the rear of "Blegberry", Shootersway -*

The objection site is located adjacent to the south western edge of the existing built-up area of Berkhamsted. Originally the area which the objector sought to have released from the Green Belt was a large L shaped piece of land to the south and west of "Blegberry", a substantial detached dwelling standing in an extensive plot on the southern side of Shootersway. However, the area has since been amended (*see O/2126/1*) to cover only that part of the land which lies to the rear of "Blegberry" plus a small triangular parcel to the south-east. The main part of this land is currently used as a paddock but the triangle of land to the east forms part of the curtilage of a new property called "Pinewood" and a small portion of the curtilage of "Woodrising".

1.25.10. For the reasons I have already identified in the preceding sections of this chapter, I find no need for this land to be released from the Green Belt in order to meet housing needs during the present Plan period. In view of the distance of the site from local facilities and services I do not consider that it would be a more sustainable location for housing than any of the sites put forward in the Plan. I note the objector's suggestion that it could form a windfall site, but PPG3 makes explicit that the Plan should not allow for housing provision to be met through greenfield windfalls.

4.25.11. Although the land is not prominent from Shootersway it is visually contiguous with the larger paddock to the west and with the open land to the south. In my view, therefore, development of the land behind "Blegberry" would result in an extension of the built-up area of the town into the surrounding countryside. I consider this would be harmful to the purposes of the Green Belt, particularly in view of its sensitive location in the narrow strip of Green Belt that lies between the properties on the southern side of Shootersway and the A41.

1.25.11. I appreciate that the diagonal line taken by the boundary across the rear of “Woodspring”, “Balcary” and part of “Blegberry” does not appear to have ever followed any definable feature on the ground. Clearly this is contrary to the advice in paragraph 2.9 of PPG2. However, this advice post-dates the definition of the boundary, which was originally established in 1984. It was not uncommon at that time for boundaries to be drawn through residential curtilages, especially where large rear gardens contributed to the general openness of the area. I am not satisfied, therefore, that the need to define a more defensible boundary would, by itself, justify the exclusion of the objection site.

4.25.13. However, I note that the triangle of land to the east has now been partially developed and the original boundary now runs right through the middle of the property known as “Pinewood”. Development has also taken place to the rear of “Woodspring”. In my view it would be far more logical, therefore, for the boundary to be modified to take account of this fact. Not only would this provide a far more defensible long-term boundary but it would also take account of the development that has occurred on the ground since that time. I am satisfied that cumulatively these factors are sufficiently exceptional in this particular case to warrant a modest amendment to the boundary of the Green Belt. Accordingly I recommend that the Plan should be modified by amending the boundary on the Proposals Map in accordance with Figure 3 and by making consequential amendments to the background to Policy 3.

Appendix 4

Extracts from Dacorum Borough Local Plan Inquiry

Inspector's Report- August 2002

Land at Swing Gate Lane Berkhamsted

- 3.39 This objector argues that exceptional circumstances justify excluding this site from the Green Belt and allocating it as a reserve site for housing, namely the construction of the by-pass which has transformed the appearance of the area and provides a defensible long-term boundary to the urban area.

Main considerations and Inspector's conclusions:

- 3.40 This land comprises some 18ha of agricultural land on the south-eastern fringes of Berkhamsted lying between the existing urban area and the new by-pass. The present Green Belt boundary runs along the rear boundaries of the properties fronting Upper Hall Park which in my view forms a clearly defined, firm and defensible limit to the built-up area. In its present open and undeveloped condition, the site contributes to one of the primary purposes of the Green Belt, namely preventing the outward spread of the urban area and safeguarding the adjoining countryside from encroachment.
- 3.41 The new by-pass has altered the physical appearance of this fringe of the town, but the road lies some 300m from the present limits of the built-up area and is separated from the site by mature woodland. The release of this site would constitute a substantial extension of the urban area, noticeably encroaching into the adjoining countryside, where development would be conspicuous from the surrounding area and from further down the valley on this prominent ridge top location. The nature of Swing Gate lane and its junction with the A41 may also create access difficulties.
- 3.43 I note that the land is not of high landscape quality and is included within a Landscape Development area, but as PPG2 implies, the condition or environmental quality of a site is not a reason to amend the Green Belt boundary or allow development. Rather than being seen as a minor alteration to rectify an anomaly or replace a weak and ill-defined Green Belt boundary, I consider this objector's proposal would represent a major addition to the built-up area of Berkhamsted which cannot be justified at this time.

GUI make claims that the Major Development sites in the Green Belt and the inclusion of LA4, Hanburys, should have an influence on the Inspector's decision:

In GUI's response to the Core Strategy Pre-Submission at p12: 'DBC identifies Ashlyns School & BFI as Major Development Sites in the Green Belt & Hanburys as a preferred local allocation these aspects set a precedent or considering further sustainable development at this southern location of the town where the A41 forms a logical boundary for a new urban development'. GUI Planning Document s5.28 claims that 'the southern extension is

contained by the A41 to the south and already consists of existing built and recreational development’.

In contrast, the 1996 Inspector’s Report Ch4 specifically refers to limited infill development which would be unlikely to prejudice the openness of the Green Belt:

- 4.11.37. I understand the Council’s concerns about the implication of designating the 2 school sites in relation to other training and business sites in the Green Belt. However, in my view neither Ashlyns Hall nor Champneys Health Resort are sufficiently substantial either in terms of their total area or the amount of built development to be defined as major developed sites. The British Film Institute site is also relatively small. More importantly, much of the built-development on the site did not pre-exist Green Belt designation but was permitted on the basis of very special circumstances. I do not consider therefore that it would be appropriate to allow further infilling on this site except where very special circumstances are demonstrated to exist.

The Inspector then makes some highly relevant comments on the Green Belt boundary:

- 4.16.2. The Green Belt boundary around Berkhamsted has now been in existence for almost 20 years. It is clear, therefore, that its long-term permanence is a material consideration. I have no doubt that the Green Belt around Berkhamsted serves a number of important purposes. Firstly it checks the unrestricted sprawl of the town; secondly it prevents it merging with neighbouring settlements; thirdly it safeguards the surrounding countryside from encroachment; and finally it helps to preserve the historic character of the town. In my view therefore changes to the Green Belt boundary around the town would only be justified if exceptional circumstances existed and if the changes could be carried out without seriously compromising the main purposes for the designation of the Green Belt.
- 4.16.3. At the time of the first Local Plan Inquiry in 1982, I note that an agreement was reached between the Council and the DOE limiting growth in Berkhamsted and a statement to this effect was included in the adopted Plan. In particular this sought to protect the skylines on the valley sides for visual reasons and to prevent spread of the town along the valley floor to avoid coalescence with Dudswell and Bourne End.