

Non Participant Statement: Issue 17

Implementation, Delivery, Infrastructure and Monitoring

Grand Union Investments and Dacorum Borough Council

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Issue 17: Implementation, Delivery, Infrastructure and Monitoring

Question 17:5: What are the main risks to delivery; does the Council have an appropriate fall back position; and is there sufficient flexibility to accommodate any unforeseen circumstances?

- 1) Para 27.12 of the Submission Core Strategy claims that flexibility is incorporated into the DPD through the delivery of housing supply which is “aimed at meeting the needs of the community” as part of a “local approach”. However, it is clear that the Core Strategy does not adopt such an approach and it is therefore contrary to the NPPF.
- 2) More specifically in relation to NPPF (50); it is clear that the CS Plan does not “plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community” (criteria 1) nor does it identify the range of housing that is required at particular locations reflecting “local demand” (criteria 2) – local demand implying below borough level and settlement specific; nor does it identify affordable housing need (criteria 3).
- 3) The NPPF indicates that local authorities are required to have a “clear understanding” of housing needs in their areas (NPPF 159 and 160). There are fundamental concerns with the Council’s methodology for assessing future housing demand.
- 4) DBC does not appear to build into their housing trajectory sufficient flexibility to accommodate change in circumstance which might affect phasing and delivery of future housing land.
- 5) None of the identified sites have been rigorously tested in terms of viability, deliverability and timescale constraints attached to each, which is contrary to the NPPF (173).
- 6) DBC’s housing trajectory appears to provide very limited headroom should certain sites not be delivered. This is contrary to NPPF (47). DBC’s contingency plan (reference to MC 26) is flawed based on its reliance on Local Authority land assets to come forward should there be a drop in housing delivery.
- 7) Local Authority asset redevelopment is a very slow process (by virtue of funding and developer procurement restrictions) and should not be considered as a reserve plan to deliver homes if targets are not met as it is highly likely such sites will not come forward, if they do, it will not be

beyond the plan period itself. This is inconsistent with NPPF (47).

- 8) The Council should not be considering a contingency plan based on Local Authority land release, when available and viable strategic sites such as Land South of Berkhamsted are ready to be brought forward through the life of the plan.
- 9) The sustainable site at Land South of Berkhamsted (as demonstrated in GUI's representations in response to DBC's Pre-Submission Core Strategy) is within single ownership with commitment to promote the site through to planning application stage with development partners. GUI have already consulted with housebuilders to discuss a deliverable approach to the site. Savills' Housing and Infrastructure Delivery Trajectory provides details in terms of phased development and infrastructure throughout the life of the development.
- 10) This trajectory could be incorporated into the overall CS plan trajectory in order to meet actual housing needs. This would also further enhance DBC's IDP to ensure new and improved infrastructure is achieved during the life of the plan and in relation to the town itself.
- 11) The draft CS plan repeatedly refers to the fact that the Site Allocations DPD will identify the extent of site boundaries for Local Allocations and other strategic sites and that the delivery of Local Allocations as "reserve" sites will be triggered by the production of the SA DPD. This completely defeats the CS aim which is to provide certainty on how much development can come forward at these site locations and when they will be delivered. It is the role of the CS, and not any subsequent plan to deliver housing needs and demands now and during the plan period across the borough.
- 12) Sites considered suitable to contribute to the housing trajectory should be delivered to meet current housing needs and demand. Footnote 11 of the NPPF states that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 13) To hold these sites in reserve will simply sterilise housing delivery.
- 14) In terms of infrastructure delivery, Paragraph 27.14 of the Submission Core Strategy refers to the release of local allocations being linked to infrastructure capacities to allow for extra flexibility in CS policy.
- 15) However, DBC's IDP Update (June 2012) is considered inadequate at examining such capacities as it focuses on existing and not future transport needs. It is also not supported by detailed

transport modelling.

- 16) In addition, the Core Strategy's transport policies state that development proposals will contribute to the implementation of the strategies and priorities set out in the Local Transport Plan and local Urban Transport Plans. However, settlement-specific local Urban Transport Plans have not yet been published.
- 17) Without this evidence, a sufficiently flexible infrastructure delivery plan is unlikely to be properly implemented, which is contrary to NPPF (31).
- 18) The CS Plan's Implementation and delivery policies are found:
 - Not positively prepared
 - Not effective
 - Unjustified
 - Not consistent with the NPPF