

Dacorum Borough Council
Core Strategy Examination

Representor ID: 620224

ISSUE 2: THE DISTRIBUTION OF DEVELOPMENT
(SETTLEMENT HIERARCHY) AND THE GREEN BELT

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1. INTRODUCTION

- 1.1 Emery Planning Partnership is instructed by Waterside Way Sustainable Planning Limited to attend the Examination into the Dacorum Core Strategy. This Statement deals specifically with Issue 2 which deals with the distribution of development (settlement hierarchy) and the Green Belt and is based on the questions set by the Inspector. We will expand on these points at the Examination.

2. SETTLEMENT HIERARCHY

- 2.1 Question 2.1 deals with the settlement hierarchy and the evidence that informed Table 1 of Policy CS1. Paragraph 8.9 of SUB1 states that the hierarchy takes into account current population, historic role, level of services, and the constraints and opportunities of each place. However, we are not aware of such a detailed assessment for each of the settlements in the Borough. The distribution of development has therefore been based predominantly on the availability of sites in the urban area rather than the actual needs of the town to meet its natural growth. This is evidenced in Table 4.6 of HG14 where Tring has 3.3% of the Borough's urban capacity which then translates to 4% of the overall requirement in SUB1. To meet Tring's natural growth (939 dwellings) it requires 10% of the requirement in SUB1.
- 2.2 We agree that Hemel Hempstead should be the main location for housing and employment growth. However, we were concerned that the other key settlements in the Borough should meet their housing needs, for example Tring which is a second tier settlement, is only proposed to provide 4% (480 dwellings) of the total requirement. This is comparable to the levels of development at the large villages and well below the percentage at Berkhamstead, the other second tier settlement. It is clear that for Tring the Core Strategy is planning for stagnation rather than growth.
- 2.3 We consider that a higher level of development can be accommodated at Tring as it is relatively self contained in that it has all the necessary shops, services and facilities for its residents and it does not depend on Hemel Hempstead or surrounding settlements for education, health, shopping or leisure. Therefore it is considered that Tring does have the potential for additional development. Under Issue 12 we provide evidence that our client's site would not impact on the setting of the AONB and does not have a Green Belt function.
- 2.4 In answer to Question 2.1 we consider that there has been no clear justification as to why Tring should have such a low proportion of the overall development requirement. The Compendium of SA (CS19) and the documents it refers to does not provide any detailed assessment. The evidence base is therefore lacking and the plan is not positively prepared

as it does not "*meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*" (para 182 NPPF).

3. SITE SELECTION

3.1 The site selection process has been undertaken through a number of documents the most recent being HG15. We have had concerns with the site assessments as they are based on comments which are not substantiated by the evidence base or the reality on the ground. Through our previous submission we have challenged how the site selection process has been undertaken with specific regard to our client's land at Waterside Way. Despite our detailed submissions and supporting environmental and technical work the Council has continued with the same conclusions for the site hence it not being included in the Core Strategy. Our position on Waterside Way is as follows.

- The site is more closely associated with the rural urban fringe of Tring than that of the wider undulating countryside to the north and west. As a result, it has little intrinsic value to the setting of the Chilterns AONB.
- Due to the site's sloping topography, association to the existing urban area of Tring and separation by the Grand Union Canal it is not considered to be integral to the setting of the Chilterns AONB to the north, which is distinctly different in character to that of the site itself. We therefore consider that using the proximity of the AONB as a reason for not identifying this site for development is not valid.
- It is wholly self-contained by the Wendover Arm of the Grand Union Canal to the north, existing residential development to the east, Icknield Way to the south and Tring Corinthians to the west.
- It is an accessible and sustainable location for development with good access to the key services and facilities in the town.
- It has the support of members of the local community as set out in HG15 which states "*Option not included in Emerging Core Strategy consultation but has been strongly promoted by the landowner and was supported by a number of consultation responses*".

- It is available for development and in addition to new housing can provide a range of other social and economic benefits.
- Waterside Way is a unique development opportunity for Tring as it is located beside the Wendover Arm of the Grand Union Canal. This is an underutilised resource and its enhancement can only assist the vitality and viability of the town. As part of our proposals we propose a marina for leisure use including a café and public access with seated areas. This proposal has the support of British Waterways and would create a strong economic and social benefit for the town.
- The proposal includes new and enhanced pitch provision and associated infrastructure for Tring Corinthians FC. The Corinthians existing pitch is to the west of the site and there is no scope for expansion. The allocation of Waterside Way would provide for that expansion and enable the club to grow.

3.2 On that basis it is a compelling candidate for allocation.

4. GREEN BELT REVIEW

4.1 Questions 2.4 and 2.5 deal with the proposed amendments to the Green Belt and whether they are justified and if so whether they go far enough.

4.2 In answer to Question 2.4, it is clear that the Green Belt must be reviewed to meet the emerging housing requirement for Dacorum as the Borough does not have the capacity to meet the housing requirement within the urban area.

4.3 Question 2.5 is therefore highly applicable as to whether the Core Strategy and/or subsequent DPDs are providing for sufficient land to ensure that the plan is deliverable. In summary our position is that the Core Strategy is not providing the necessary houses to meet Tring's natural growth and further land is therefore required either for allocation or to be safeguarded for future development. Flexibility is a key objective as paragraph 14 of NPPF requires local plans to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. In Dacorum, where the Green Belt covers just over half of the Borough, the Core Strategy as submitted, will not achieve this flexibility.

4.4 Further guidance is provided by paragraph 83 of NPPF. It states that when reviewing a local plan, local planning authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

- 4.5 The position of the Council is set out in paragraph 8.28 of SUB1 which states that “*A strategic review of Green Belt boundaries is not required, although some small-scale releases will be necessary to meet specific local needs or to correct minor anomalies*”. Policy CS5 then advises:

“No general review of the Green belt boundary is proposed, although local allocations (under Policies CS2 and CS3) will be permitted”.

- 4.6 We consider that this is directly contrary to paragraphs 14 and 85 of NPPF which require local planning authorities to meet the objectively assessed needs and longer-term development needs stretching well beyond the plan period.
- 4.7 SUB1 advises that the detailed boundaries of the proposed sites will be determined through the Site Allocations DPD. However it is not clear whether the strategic sites and local allocations are the definitive list or whether more sites may be allocated through the Site Allocations DPD. We assume it would be the latter as Policies CS2 and CS3 would not be required if that was not the case. Either way there is not the required flexibility in the Core Strategy due to the over-reliance on unidentified sites in the urban area. Indeed, page 1 of HG15 provides a clear indication that the review of the Green Belt has not gone far enough. It states:

“Where Green Belt boundaries are reviewed, the aim should be to release sufficient land to avoid further reviews before 2031.”

- 4.8 This is contrary to NPPF which requires any review to be post the plan period to provide the necessary degree of permanence.

The need for flexibility

- 4.9 The total housing requirement for the plan period is 10,750 dwellings which equates to 430 dwellings per annum. After taking account of completions and commitments (page 28 of HG20) the residual requirement for the period 1st April 2012 to 31st March 2031 is 8,261 dwellings. This equates to 435 dwellings per annum. We consider that Policy CS17 should specifically state that the requirement is a minimum to allow an element of flexibility.
- 4.10 HG20 advises that 1,945 dwellings are committed. Assuming that the council’s position is correct, land is required to deliver 6,316 dwellings within the plan period. The submission draft informs us that 1,820 dwellings are identified as strategic sites and local allocations. This leaves 4,496 dwellings to be built on non-allocated sites.
- 4.11 In our view there is an over-reliance on non-allocated land to achieve the Core Strategy requirement and if the non-allocated sites do not deliver, then there will not be the necessary land to meet any shortfall due to the minimal alterations to the Green Belt. This is highly likely to undermine the delivery of the Core Strategy.

- 4.12 Indeed, Policy CS17 states that *"should housing completions fall below 15% of the housing trajectory at any time and review of the deliverability of planned sites indicates that the housing trajectory is unlikely to be recovered over the next 5 years, the Council will take action to increase the supply of deliverable housing sites"*. As we note above the most likely scenario for non-delivery is from the over-reliance of sites in the urban area. If that does materialise what action can the council take if there has only been a limited number of sites taken out of the Green Belt and no safeguarded land designated? In short there is no solution.
- 4.13 As set out in our submission to Issue 6, the Council needs to plan for a greater housing requirement and provide a greater number of allocated sites in the plan. In our view a strategic review of the Green Belt is required even if the requirement in the Core Strategy is correct. On this basis alone the Core Strategy is unsound.
- 4.14 Tring is a good case study as to why the Core Strategy is unsound on this issue. Table 1 below sets out the Council's position as to how the housing requirement of 480 dwellings in the Core Strategy will be met in Tring.

	No of Dwellings
Completions	71
Planning Permissions	118
SHLAA sites	51
Windfalls	74
Proposed Allocation	150
Total Commitments	464

- 4.15 To achieve this level of development there is a significant reliance on sites within the urban area, some of which are currently in employment use or longstanding commitments. If these sites are not deliverable or the housing need for the town is greater than currently set out in SUB1 then greenfield urban extensions will be required. However as the town is constrained on all sides by Green Belt and only one site (LA5) is being proposed for allocation, there would not be the available land to deliver additional housing. The only way forward is for additional land to be allocated or at the very least safeguarded land.

Safeguarded Land

- 4.16 Paragraph 85 of NPPF sets out guidance for local planning authorities when they are defining boundaries. The third bullet point states that where necessary, they should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The fifth bullet point states that they should also satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. On both counts the Council fails to meet NPPF.
- 4.17 Given the reliance on local allocations in the Green Belt, the Council must consider a review of its Green Belt and consider providing either allocated sites or safeguarded land in its Core Strategy to meet the needs to 2031 and beyond. On that basis the Core Strategy is neither positively prepared nor consistent with national policy.