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Dacorum Core Strategy Public Examination

Issue 6 “Providing Homes”

Submitted by
Sellwood Planning
on behalf of
Gleeson Developments Ltd

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Regulated by RICS

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1.0 **Introduction**

1.1 This statement has been prepared by Sellwood Planning on behalf of Gleeson Developments Ltd (398370). Gleeson has an Option over part of Local Allocation LA1 (Marchmont Farm, Hemel Hempstead) and supports the Council in its proposals for the residential development of this land.

2.0 **(Q(6.1)) “Are the housing policies consistent with national guidance supported by a clear and robust evidence? Is the identification of strategic sites and local allocations appropriate and is the status of the SS and LA policies clear? There are no local allocations or strategic sites included in the Place Strategies for Kings Langley or the Countryside. Is that a satisfactory approach to take? How will the Council assess planning applications in these locations?”**

2.1 The submitted Core Strategy was largely prepared prior to the publication of the National Planning Policy Framework in March 2012, so it is understandable that the plan is not fully compliant with the NPPF. However, notwithstanding the contents of the NPPF, Gleeson and other representatives of the housebuilding industry have expressed concerns that the emerging plan does not adequately meet housing needs.

2.2 The starting point for the assessment of the adequacy of the housing provision should be the statutory regional part of the development plan, which in the remainder of the region would be the East of England Plan (2008). However, in the case of Dacorum Council and Welwyn and Hatfield Council, the housing provision was quashed by the High Court. As a consequence, there is no statutory guidance at regional level. Prior to its quashing, Policy H1 of the EEP stated that the Dacorum housing provision should be 12,000 dwellings or 600 per year. This was based on the evidence base assembled by the Regional Assembly in the period up to 2008. Whilst the dwelling provision of 600 dwellings per year has no legal weight, it is a useful indicator of what EERA and the Government felt was appropriate in 2008.

- 2.3 In contrast to the quashed regional provision of 600 dwellings per year, Policy CS17 of the submitted Core Strategy proposes to provide 430 additional dwellings per year (2006 to 2031). The Core Strategy needs to fully justify the reasons for proposing a housing provision which is 28.3% lower than that indicated by the EEP evidence base.
- 2.4 It is accepted that the EEP was adopted four years ago and some of the evidence on which the quashed figure of 600 dwellings per year was based is becoming dated. It is useful, therefore, to have more up to date household projections and the initial results of the 2011 Census. The latest household projections were published in 2010 (2008 base) and suggest that the number of households in Dacorum will rise from 57,000 in 2006 (the start of the period) to 69,000 in 2028 and 71,000 in 2033. Whilst there is not a 2031 figure, it is reasonable to assume a mid point of 70,000. This equates to a rise of 13,000 households over the 25 years or 520 per year. This is lower than the EEP figure but still 90 dwellings per year more than that proposed in the Core Strategy.
- 2.5 The initial results of the 2011 Census show that there were 59,900 households in the Borough in 2011. This broadly conforms to the 2008 household projections which, whilst not providing a 2011 figure, expected the number of households to rise from 58,000 in 2008 to 61,000 in 2013. This gives the 2008 household projections extra robustness.
- 2.6 It is noted that Table 3.1 of the Council's Background Paper 'Selecting the Core Strategy Housing Target' (June 2012) provides a number of population projections. Whilst only two of these project a zero net migration scenario, both indicate that the proposed Core Strategy housing provision of 10,750 units is lower than that necessary to achieve zero net migration. On this basis, the strategy implies net out migration from Dacorum in the period to 2031. This does not accord with the aims and objectives of the NPPF.
- 2.7 So, to answer the first part of this question, the submitted Core Strategy does not accord with the guidance in the NPPF and the most recent evidence on housing needs

indicates that the housing provision should be increased from 430 units per year to closer to 520.

2.8 Whilst it is unclear from the document, it is assumed that the Strategic Sites are within existing urban areas and do not require the release of Green Belt land. In contrast, the Local Allocations are sites which are not within the built up area and do require to be released from the Green Belt. This distinction should be made explicit. The terminology is also misleading since several of the local allocations are significantly larger than the Strategic Sites.

3.0 (Q(6.2)) “Is the information in the SHLAA (2011) soundly based? Have current economic conditions been taken into account?”

3.1 The SHLAA site information is robust. However, it is considered that the delivery of housing is over reliant on town centre regeneration sites which have a high proportion of flats. There is little market demand for this type of accommodation and this could depress completion rates.

4.0 (Q(6.3)) “Is the apportionment of growth between the settlements properly justified?”

4.1 Table 8 of the submission Core Strategy indicates that 77.7% of the anticipated housing is expected to be located in Hemel Hempstead. This is both appropriate and justified by the evidence. Hemel Hempstead is by far the most significant settlement in Dacorum and contains a good range of housing, employment, facilities, services and access to public transport.

4.2 Table 3.4 of the Housing Land Availability Paper (July 2011) also shows how Hemel Hempstead was the dominant source of dwelling completions between 2001 and 2010. As policies to deliver more sustainable patterns of development start to bite, it would be expected that the proportion of completions in the largest settlement would

rise. As a consequence, a target of 77% is not unreasonable. Indeed, a lower proportion would risk creating a less sustainable pattern of development which would be contrary to the NPPF.

5.0 (Q(6.4) “Is the overall housing provision based on a sound assessment of supply and demand? In particular,

5.1 (a) will the Core Strategy meet the full, objectively assessed needs for market and affordable housing in the Borough?

For the reasons set out in question 2, the housing provision should be increased to more closely reflect the latest household projections.

5.2 (b) are the expectations for delivery for existing commitments reasonable?

As noted in Section 3, the main concern of Gleeson is that many commitments were based on historic market conditions which do not reflect current patterns of demand.

5.3 (c) is the proposed trajectory realistic and can it be delivered?

It is felt that the trajectory is over optimistic, particularly in the first five years. It is for this reason the Local Allocations will need to be made available at an early stage in the plan period.

5.4 (d) what assessment of previously developed land has been undertaken?

This is an issue for the Council to answer.

5.5 (e) is there sufficient flexibility to deal with changing circumstances affecting phasing and delivery – in particular with regard to the economic and financial constraints, land ownership and infrastructure provision?”

There is insufficient flexibility at present to accommodate unforeseen changes in circumstances. Flexibility would be enhanced by allowing the Local Allocations to come forward earlier in the plan period.

6.0 (Q(6.5) “Bearing in mind the significant need for housing in the Borough, why was the higher growth option discounted?”

6.1 This issue is a matter for the Council to answer.

7.0 (Q(6.6) “What is the role of neighbouring planning authorities in accommodating some of Dacorum’s housing needs and can it be demonstrated that it is a role which they are undertaking?”

7.1 It has to be accepted that the ‘Duty to Cooperate’ under the Localism Act only came into effect at a very late stage in the preparation of this plan. However, since Dacorum Council does not appear to be accommodating the full, objectively assessed needs of the Borough, it is implicit that some elements of unmet needs are being displaced to other local authority areas. There is no sign that adjoining planning authorities are willing to perform this role. For this reason, the Core Strategy should be seeking to accommodate a greater proportion of its housing needs.

8.0 (Q(6.7) “Proposed minor change ML26 refers to the shortfall of housing provision of 15% being used as a trigger for action by the Council. What is the justification for the 15% figure?”

8.1 This is a matter for the Council to answer, although it is unclear where the 15% has been derived from.

9.0 (Q(6.8) “Should the Core Strategy establish the Council’s overall approach to housing densities, as suggested in paragraph 47 of the NPPF?”

9.1 It is considered that the issue of density is adequately covered in Policy CS10(c) and CS11(a).

10.0 (Q(6.9) “How will the housing needs of villages be met?”

10.1 No comment.