

DACORUM BOROUGH COUNCIL SITE ALLOCATIONS EXAMINATION: OCTOBER 2016

Statement from CPRE Hertfordshire

MATTER 4 – HOUSING, INSPECTOR’S QUESTIONS 2, 3, 4, and 6

1. I am Stephen Baker, DMS, BSc, Dip TP, MRTPI, Planning Manager at Campaign to Protect Rural England (CPRE) Hertfordshire.
2. This statement complements our original representations on the Site Allocations Pre-submission DPD 2014, and Focussed Changes 2015, which still apply, and seeks to address the Inspector’s questions as set out in her Matters, Issues and Questions document.
3. This statement addresses issues that are closely related to Matters 2 and 6 for which separate statements have been prepared by CPRE Hertfordshire.

Question 2: Specifically, should more housing be allocated and if so would this be possible prior to completion of the Green Belt review?

4. CPRE Hertfordshire does not consider that there is any justification for the allocation of additional housing in advance of the completion of the review of the Core Strategy (CS) and the publication of the Council’s intended new Local Plan.
5. If the allocation of additional sites were to include any Greenfield land currently within the Green Belt this would have to been justified by exceptional circumstances in order to be in accordance with paragraph 83 of the NPPF, and no such circumstances have been set out by the Council in the SA DPD or the Focused Changes. The allocation of additional housing sites would not be consistent with the CS Policy (CS3) for site allocations.
6. No Green Belt sites should be released for development until this action has been demonstrated as being necessary as an exception to Green Belt Policy through the thorough testing of the need for those Local Allocations proposals in the light of up-to-date information on housing need and supply, which we believe can only be carried out in the context of the review of the Core Strategy and publication of the Council’s intended Local Plan.

7. Please also see our Statements on Matters 2 and 6.
8. Given the national Green Belt policy context set out in the NPPF, the need for the release of Green Belt land for development has not been demonstrated and this is not therefore justified or founded on a credible evidence base and is not appropriate when considered against available suitable land. CPRE Hertfordshire considers that exceptional circumstances do not exist which necessitate a change to Green Belt boundaries in the short term.

Question 3: In the light of the Government's stated objective in NPPF paragraph 47 of boosting significantly the supply of housing, should the Council be seeking to constrain the release of the Local Allocations? If so, what is the rationale for this?

9. NPPF paragraph 47 states what the Government expects local planning authorities to do to boost housing supply when preparing local plans, and that is to use evidence '*to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework* (CPRE emphasis)...'
10. That statement is direct reference to the paragraph 14 requirement that Local Plans should meet needs unless specific policies in the framework indicate development should be restricted (CPRE emphasis), with specific policy constraints, including AONB and Green Belt, both applicable to Dacorum, that limit the ability of authorities to fully meet needs, set out in footnote 9.
11. In this context, and given that Dacorum shares housing market areas with other authorities, including those that are less constrained by Green Belt and AONB, CPRE Hertfordshire considers that it is Dacorum's duty to constrain the release of the Local Allocations that lie within the Green Belt until it is essential to release them, and then only if and when there is no alternative that does not breach specific policies set out in the NPPF. The Core Strategy (CS) also clearly states that the Local Allocations should not be delivered until 2021 at the earliest.
12. Please see our separate comments on this issue in our statement on Matter 2, and below on housing supply under Question 4, that are also relevant to the timing of development of the local allocations in the Green Belt.

Question 4: Is it assumed that all sites will be developed in the Plan period? Are they all likely to be developed? What account is taken of windfalls? What rate of windfall development is anticipated over the Plan period?

13. There has been a consistent flow of 'windfall' housing development in Dacorum, as revealed in the Council's annual monitoring reports. Such windfalls, which have added significantly to housing supply, at a rate of around 100 per year, are not however projected to take place during the full period to 2031, even though there is no planning reason why they should not be expected to continue at a similar or greater rate in line with Government policy to encourage such windfalls as a means of boosting housing supply. Table 3 of Appendix 1 to the January 2016 AMR for 2014/15 specifically excludes major sources of windfall development from the Council's Core Strategy Housing Programme, and CPRE Hertfordshire considers this is not justified if the consequence is the early release of Green Belt land for development.
14. Planning Practice Guidance, which is not in any event Planning Policy, does not prevent Council's from including windfalls in their calculations of future housing supply, and in areas of high demand and where a key Green Belt purpose is to '*assist in urban regeneration, by encouraging the recycling of derelict and other urban land*' (CPRE emphasis - text from NPPF paragraph 80), failure to acknowledge the expected scale of windfall development risks the unnecessary loss of valuable Greenfield sites.
15. Furthermore, since June 2013, when the regulations limiting the conversion of shops, offices and other commercial buildings to dwellings were relaxed, prior notification has been given of a total of 525 additional dwellings, or 175 dwellings per year, from the change of use of offices alone in Dacorum. CPRE Hertfordshire considers that this significant contribution to the meeting of housing needs should be recognised and expected to continue now that the relaxation in respect of changes of use from offices is concerned, has been made permanent.
16. One of the principal reasons given by Dacorum Council for the scale of new office provision included in the CS was that there was a significant demand for new modern office accommodation to replace the existing stock of largely vacant offices in Hemel Hempstead in particular for which there was a lack of demand, and CPRE Hertfordshire pointed out that there was roughly one million square feet of vacant floorspace in the town at that time. What better use of such redundant floorspace than conversion to housing that can meet local housing demand and help to avoid unnecessary

development in the Green Belt, all consistent with Green Belt purposes set out in NPPF paragraph 80?

17. Following the reporting by CPRE Hertfordshire of the results of a research exercise in Hemel Hempstead, referred to in our statement on Matter 2, some sites in and around Maylands, previously designated as 'employment' sites, are now to be redeveloped for housing. These represent net gains to housing supply that should be recognised in Dacorum's housing trajectory, which should also recognise that they represent part of an ongoing trend that should be reflected in calculations of expected and planned housing supply over the Plan period, pending the review of the CS in the light of up-to-date information on both Housing Supply and Housing Need in the market area.
18. If these net gains in housing supply were to continue at a similar rate, by 2031 they would far exceed the total provision of 1,550 dwellings expected from the six Green Belt sites that make up the local allocations set out in the CS and the SA DPD. It is suggested that when the Core Strategy is reviewed, these substantial housing gains, not accounted for when the Core Strategy was prepared, should be recognised, and taken into account when setting a new housing target for the Borough, and potentially completely avoiding the need for greenfield sites to be allocated for housing in the Green Belt.

Question 6: Where are the existing housing commitments? What form do they take – large or small site? Is their distribution in accordance with the CS?

19. Although Dacorum have provided information on commitments in the Housing Commitments Position Statement number 42 as at 1 April 2015 (HG1), this does not represent the full extent of housing supply other than new site allocations over the Plan period. The November 2015 Site Allocations Background Issues Paper (SA4) states at paragraph 2.47 that conversion of offices to residential under the prior approval process '*will provide a useful supply of future housing*', and that they '*have had the effect of boosting commitments from changes of use and conversions*'. Paragraph 2.51 also suggests that this source of supply in town and local centres may increase further, and paragraph 2.89 also highlights this '*growing contribution to housing supply*'. Please see our comments above on Question 4.
20. CPRE Hertfordshire is therefore disappointed that the same paragraph specifically excludes a number of sources of windfall housing, and still projects an excess against

the housing target, given that this will result in the loss of Green Belt land. Paragraph 2.90 states that *'In reality, events will be overtaken in early course via a Single Local Plan'*, and CPRE Hertfordshire considers it is that new Local Plan that should determine the provision for housing that is needed, in the context of all likely available sources of housing supply, based on up-to-date information that reflects recent changes to planning regulations and the policy emphasis on the better use of previously developed land.

21. It is clear to CPRE Hertfordshire that housing commitments arising from existing planning permissions are significantly understating housing supply, and will continue to do so over the next few years based on Dacorum's own information on commitments, including for example, 'new sites', as set out in Appendix 1 (Background Tables to the Core Strategy Housing Trajectories), Table 3 (Summary).
22. CPRE Hertfordshire accordingly asks the Inspector to carefully consider the relationship between commitments, windfalls and site allocations as set out in the Council's background documents, before reaching conclusions about the housing supply position in Dacorum over the Plan period.