

NMB PLANNING

Dacorum Borough Council Site Allocations DPD Examination in Public

Response to questions in Inspector's Matter 4: Housing

On behalf of Crest Nicholson (landholding at Red Lion Lane, Hemel Hempstead)

September 2016

Context for response

- 1.1 This response has been prepared by NMB Planning on behalf of Crest Nicholson, whom together with Linden Homes, own land south of Red Lion Lane, Hemel Hempstead, which is within the land area covered by draft Policy SA10: Education Zones in the submitted Dacorum Site Allocations DPD.
- 1.2 Crest Nicholson has responded to earlier consultations regarding the Site Allocations DPD, most recently the Proposed Focused Changes consultation which took place in September 2015.
- 1.3 Crest Nicholson are active house builders in the Borough, with the residential-led redevelopment of a former industrial site on the northern side of Red Lion Lane, Hemel Hempstead ongoing.
- 1.4 A remnant part of the redeveloped site is identified as a potential education site within Education Zone EZ/1: Nash Mills in Policy SA10 of the submitted Site Allocations DPD. The site is under the ownership of Crest Nicholson. Whilst Crest is supportive of the inclusion of the site for potential educational use, it is actively promoting the site as being more suitable for residential development. It is in this context that we respond to the relevant matters and questions raised by the Inspector ahead of the Site Allocations DPD Examination in Public.
- 1.5 Responses have been prepared to questions in Matter 2, 4 and 6.

Question 1. Is the overall amount of housing provision and its distribution in the Plan consistent with the CS? How has the actual number of dwellings allocated been arrived at? Why the buffer? Should it be greater as suggested by some representors?

- 2.1 It is our understanding that the annual housing target of 430 dwellings was derived from the Core Strategy identified requirement. The Housing Programme set out in Table 3 of the Site Allocations DPD states that there are 11,091 dwellings in total (including completions, allocations and windfall sites) to provide housing for the period 2006 to 2031. This timeframe spans 26 years, with an equivalent total requirement of $430 \times 26 = 11,180$ dwellings. Therefore at present, the total identified sites do not provide the required amount of housing identified by the adopted Core Strategy, being 89 dwellings short in total.

- 2.2 Furthermore, with the identified supply being close to the housing requirement, this leaves no room for any flexibility in the supply, or lack of delivery on any of the sites. This is not considered to provide a robust and responsive approach to housing delivery in the Borough going forward.

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

- 3.1 Therefore following on from our response to question 1 above, we strongly believe that more housing should be allocated in order to provide flexibility in the housing supply.

Question 4. Is it assumed that all sites, both commitments and allocations, will be developed during the Plan period?

- 4.1 It appears that the Council is banking on all identified/allocated sites coming forward for development. We consider this to be an unrealistic approach given the nature of housing delivery.
- 4.2 It is also concerning how the rate of delivery of the housing requirement is predicted in the housing trajectory (Appendix 2 of the Site Allocations DPD) to be very variable; e.g. 379 dwellings in 2014/15, 629 dwellings in 2015/16 and 267 dwellings in 2020/21. This does not provide much certainty for residents of the Borough in delivering a steady supply of new homes during the Plan period.
- 4.3 It is considered that paragraph 6.20 of the Site Allocations DPD, which says that only the local allocations have phasing requirements, and the remaining identified sites will be encouraged to provide a 'steady delivery' does not go far enough in ensuring that there will be an annual supply of housing each and every year of the Plan which meets the minimum identified requirement, i.e. 430 dwellings per annum. It is recognised that overall delivery each year will vary, however the degree of variability should be minimal if a proper planned approach is implemented.