

# Dacorum Borough Council Core Strategy EiP

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## Response to the Inspector's queries and issues – November 2012

### AMEC on behalf of The Crown Estate (ID: 211068)

#### **Question 1 B (b) What are the implications for the Core Strategy and in particular the 11,320 dwellings which the Council considers to be the objectively assessed needs.**

1. It is considered that the Council's objectively assessed need is still too low in comparison to the ONS population projections for England. The Council outlines that they are planning to provide around 430 / 450 dwellings per annum (page 6). This is significantly lower than the level predicted by the ONS projections which indicate a need for around 500 dwellings per annum (page 5).
2. It is considered that to make the plan sound and adequately meet housing needs the Council should take account of the ONS projections and plan for a higher rate of growth including some provision for migration. The Council has not set out how it will contribute to meeting the *“full, objectively assessed needs for market and affordable housing in the **housing market area**”* (emphasis added), as required under paragraph 47 of the NPPF.
3. On page 5 the Council states that objectively assessed needs should take account of environmental restrictions, particularly the Green Belt. However in the absence of a thorough Green Belt review the Council is not in a position to conclude that the Green Belt is a constraint to a higher rate of growth or not. Thus the Council have failed to comply with paragraph 83 of NPPF which states that through a review of a Local Plan, regard should be given to Green Belt boundaries and *‘their intended permanence in the long term so that they are capable of endurance beyond the plan period.’*

#### **Question 1D: St Albans**

4. The letter from St Albans Council dated 16 October 2012 has included reference to additional meetings with Dacorum Borough Council in relation to East Hemel Hempstead AAP area in 2011. This information was not included in the Council's examination document SUB 8 (Statement of Compliance with the Duty to Co-operate). The Crown Estate has received no information about these meetings. As the major land owner in East Hemel Hempstead AAP they would have expected to be informed of these meetings, the basis of them and their outcome.
5. In addition, it appears that St Albans Council has pre judged issues about EHHAAP in its own Strategic Local Plan which is not considering potential for additional development in this area or a Green Belt review.
6. We remain concerned that there is no evidence of effective joint working to date as set out in our EiP statement. We are also concerned that, despite intended future working as set out in the letter, the scope of joint working is far too limited. We therefore maintain our view that there has been no effective joint working and therefore the plan fails test of soundness.

**Question 10A (b): Panel Report**

7. The Council states on page 18 that no strategic review of the Green Belt was required because the requirement set out in the East of England Plan was quashed. This however contradicts a comment made by the Council on page 5 where they state that a higher rate of objectively assessed housing needs would need to account for environmental restrictions, particularly the Green Belt. It is therefore clear that whatever the position of the East of England Plan, the plan cannot be found sound without a thorough review of the Green Belt boundaries to help meet objectively assessed housing needs.

8. On Page 18 the Council comments that the physical capacity of the Gorhambury proposals is around 5,200 dwellings (in examination document HG16 they refer to 5,300 dwellings). and that if this were taken forward additional work would be required to test the option on issues such as landscape and Green Belt. The evidence submitted by AMEC as part of the examination (ref OT11 Proposed Development at Gorhambury: Hemel Hempstead East supporting information) already demonstrates that a substantial amount of technical work has been undertaken which confirms the suitability of the land for development.

9. The Gorhambury proposals have an overall capacity of some 6000 -7000 dwellings with smaller scale options available as set out in the Crown Estate's representations on Matter 1. The Crown Estate's assessments have also taken full account of gas pipelines and the need for new infrastructure including schools.

10. Regardless of the scale of growth proposed paragraph 5,128 of the East of England Plan panel report states that:

*"While a strategic review of the Green Belt is required we are confident that this can take place without compromising the broad integrity of the Green Belt"*

The evidence prepared by The Crown Estate supports this view and demonstrates how development between Hemel Hempstead and the M1 could take place without undermining the wider Green Belt with the M1 providing a long term defensible boundary as required by NPPF (paragraphs 83 and 85).

**End**