

Our ref : MF/4107

05 November 2012

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Dear Mr Kemp

**Dacorum Core Strategy Examination
Comments on Inspector's Questions on behalf of Taylor Wimpey**

We refer to the recently published Inspector's Questions and the responses of the Council thereto. We would make the following comments which we would be pleased if you could bring to the attention of the Inspector.

Local allocations

The Council's comments are generally helpful in clarifying the status of Local Allocations. As the Council sets out, the landowners at the LA3 allocation have agreed with the details of the release of the site being handled through the Site Allocations DPD. However, there is some contradiction in the Council's statement which perhaps confuses rather than assists clarification of the role of the LAs. On the one hand the Council indicates that changes could be made to "remove the impression of an unending reserve" whereas on the other they state that "the 'reserve' role of the local allocations is important."

The local allocations should certainly not be seen as 'reserve' sites. They are *firm allocations* with an intention that they should generally be phased later in the plan period (i.e. to be released at 2021) unless other considerations apply.

The proposed new paragraph after 18.16 is in most ways helpful; however, we consider that the phrase "*Local allocations will be held back to encourage urban sites to come forward...*" is inappropriate as it once again suggests a reserve site status. In addition, it is not solely the role of the LAs to ensure supply *later* in the plan period – they are part of a strategy to ensure a continuous supply of housing *throughout* the plan period.

We consider that a more accurate description of the process henceforward is as follows: "*The release of Local Allocations will be managed taking account of the strategy of encouraging urban sites to come forward earlier, to retain countryside for longer and to ensure a continuous supply of housing at appropriate levels to meet needs throughout the plan period.*"

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We also consider some minor changes to the Council's amended Policy CS3 should be considered as follows :-

"The delivery of local allocations will be managed to ensure a continuous supply of housing. The housing trajectory currently suggests that completed units will be needed at these sites by 2021 at the latest."

The phrase "completed units" is important as it recognises that the planning process will need to commence some years before 2021

We further suggest as follows:-

"The release date of any local allocation may be brought forward in order to maintain a five year housing land supply or to deliver infrastructure to meet the needs of the area within which they are located."

This latter addition reflects criterion (c) within the policy and clarifies that housing land supply is not the only reason why a local allocation may be released. It also reflects the comments on page 13 of the Council's statement.

We have no strong views about the terminology although consider that "strategic allocation" more accurately reflects the role of the land at West Hemel Hempstead.

The proposed change to para. 14.13 should be amended to reflect our policy wording above, namely *"The housing trajectory currently suggests that completed units will be needed at the Local Allocations by 2021 at the latest."*

We would be grateful if the above comments could be taken into account by the Inspector in framing his recommendations.

Yours sincerely



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