

ISSUE 10 PLACE STRATEGIES: HEMEL HEMPSTEAD

10.1. (a) Is the policy for growth and change in this area appropriate and justified, including in relation to national guidance and local needs, and in terms of economic, social and environmental impact?

10.1.1. Para. 6 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development and paras. 7 - 10 address the need for this to be based on integrated approach to economic, social and environmental considerations. Thus the approach to this issue involves a prima facie obligation on the Local Authority to identify in full the needs for market and affordable housing, and then to establish a strategy that will meet those to the extent that it is compatible to do so having regard to a balance of economic, social and environmental considerations.

10.1.2. Specifically as regards housing, para. 47 of the NPPF requires Local Authorities to:

".....use their evidence-base 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".

10.1.3. As the principal settlement in the Borough and the top tier in the hierarchy, Hemel Hempstead has a pre-eminent role in delivering the growth which the Council's vision and strategic objectives seek. By the same token it is the place where the achievement of national policy requirements for housing and economic growth is inevitably focused.

10.1.4. Previous sessions at the Examination (in particular Issues 1,2 and 6) will have considered the soundness of the Council's proposed housing target and we have made our submissions that the target is inadequate to meet the requirements of para 47 of the NPPF and that additional land at Hemel Hempstead is suitable (i.e. Shendish) and should be made available to remedy this deficiency.

10.1.5. In its Background Paper 'Selecting the Core Strategy Housing Target, June 2012' the Council acknowledges that *the recent national household projections are a reasonable yardstick for assessing demand* (para. 5.2) and confirms that *the demand led scenario would have fulfilled Government projections* (para. 5.8). However, it goes on to say in para. 5.5 that *it is difficult to see how full demand can be achieved satisfactorily given the Green Belt and other environmental constraints of the Borough.*

10.1.6. In our submission the Council has a duty to put forward a strategy that is capable of meeting the full demand in light of government policy. Moreover the judgement that it has made to the contrary is to a large extent subjective. There is no evidence that would dictate an overriding objection to a particular increase in housing provision.

10.1.7. We have addressed this in our statement in respect of Issue 1 (Question 1.3), with reference to the analysis of alternative housing targets in the Sustainability Appraisal under Policy CS17 (see SA report para 6.5.2 (pp 59 – 60) and Appendix E (pp 24 – 31)). The traffic light analysis in Appendix E displays very little differences in scoring between the proposed housing target (430pa) and the alternative based on objectively assessed needs (538 pa) which we advocate. The differences identified, some of which are in fact in favour of the higher figure, do not demonstrate that the higher figure cannot be met – they amount to no more than generalised assertions which are then

carried forward into the main SA report. The single negative score in Appendix E is in relation to landscape and townscape (No. 11). The comment made against the higher figure is:

“More greenfield sites required to deliver this level of housing. Additional Greenbelt land release would be required with associated adverse effects on local landscapes and the potential for coalescence of settlements. There would also be a loss of tranquillity and increased light pollution in the area affected by the new developments.”

10.1.8. This is not an adequate basis to override national policy to meet housing needs in full. There is no attempt to quantify or particularise the adverse impacts of meeting the higher figure which there would have to be to satisfy the requirement in para 14 of the NPPF that objectively assessed needs should be met unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

10.1.9. The ‘Assessment of Potential Local Allocations and Strategic Sites, June 2012’ demonstrates that there are relative advantages and disadvantages with all the sites and that those that the Council has chosen to prefer¹, even on their own analysis, do not perform materially better than some others that it has chosen not to.

(b) Can local infrastructure satisfactorily accommodate the proposed growth?

10.1.10. We are only able to comment with regards our proposed allocation at Shendish. We believe that the proximity of the site to local services, the proposed erection of a primary school, the provision of employment land and our own investigations into transport, access and utilities Infrastructure show that local infrastructure can accommodate the development at Shendish.

10.1.11. In this regard we refer to the detailed appraisal of the Shendish opportunity set out in the Development Framework Document which accompanies our response to the Pre Submission consultation.

(c) Have all reasonable alternative sites been assessed?

10.1.12. The potential sites all appear to have been examined in the Council’s Assessment of Local Allocations and Strategic Sites, June 2012. The Development Framework Document which accompanies our Pre-Submission response provides a more comprehensive analysis of the Shendish (combined proposal)² site than that which underpins the Council’s critique. It is based on a detailed assessment of landscape, ecology, heritage, transport, drainage, utilities, noise and vibration considerations, the related reports being supplied as appendices.

10.1.13. On the basis of this evidence the Council’s analysis does not accurately reflect the site circumstances. For instance:

- Distance to a local shop is stated to be 2172m. The centre of the site is 780m (crow flies) and 1540m (road) from Sainsbury’s supermarket and other retail outlets in London Road;
- Distance to a station is stated to be 1390m. It is 500m from Apsley Station;
- Distance to a primary school is stated to be 1911m. It is 560m from Two Waters Primary School;
- It is stated that Rucklers Lane and its junction with London Road are *unlikely* to have the capacity to cope with the extra traffic resulting from the proposal put forward by W Lamb. This

¹ which we challenge - see our response to Pre Submission consultation section 5.4 and Appendix 4: comparison between West Hemel and Shendish

² Assessment of Local Allocations and Strategic sites, June 2012 pp 62 - 66

appears to dismiss (without countervailing evidence) the detailed assessment carried out by WSP (see section 4.3 of Appendix 2 of the Development Framework document);

- It is stated that development would *breach a strong Green Belt boundary to the south of the town provided by the railway line*. This ignores the fact that the site adjoins a significant area of built development already excluded from the Green Belt on the south side of the railway line – ie the Manor Estate and the extension to it (and release from the Green Belt) now under construction;
- It is stated that development would erode the gap between Hemel Hempstead and Kings Langley. It would not;
- It is stated that development would set a precedent for further development to the south of the railway line. It would not. The strategy deals comprehensively with this self-contained area of land. In any event, the permanence required of Green Belt boundaries once set would preclude any further release, and certainly unless exceptional circumstances could be demonstrated through a subsequent review of the Plan;
- It is stated that development here would not support the vision of creating cohesive communities in the town's neighbourhoods. A specific opportunity exists at Shendish to reinforce the neighbourhood concept by integrating existing developments to the south of the railway at the Manor Estate and Rucklers Lane which currently do not conform to the neighbourhood concept.

10.1.14. Additionally on this matter we note the conclusion on deliverability (page 64 of the Council's assessment) that the main barrier to development is finding an access solution that meets the approval of the Highway Authority and the installation of a new/improved railway bridge. The Inspector is asked to note that as a result of discussions with Network Rail and the Highway authority it has been established that neither party has an objection in principle to this. Specifically, Network Rail is content provided the Highway Authority will adopt the bridge and the road (it is not currently adopted); the Highway Authority has indicated that they would be willing to adopt the access road and, in principle, the bridge over the railway, provided the bridge is upgraded to current design standards which may mean its replacement. For the purposes of establishing the principle of release at this stage in the process, access is therefore not a barrier to development.

10.1.15. Finally, we draw the Inspector's attention to the Sustainability Appraisal of the Shendish location (as promoted by W Lamb) which is contained at Appendix 3 to our main response statement to the Pre Submission Core Strategy. The intention has been to provide the Inspector with a detailed evidence base, subjected to SA, allowing the opportunity for the allocation of this site to be recommended as a Main Modification to the Core Strategy.

(d) Has the transport infrastructure required to support the proposed growth been properly assessed and can it be satisfactorily provided?

10.1.16. We are only able to comment with regards our proposed allocation at site at Shendish. In that regard we draw the Inspector's attention to the Development Framework Document and in particular the Transport and Highways Appraisal at Appendix 2. See also para. 10.1.11 above.

10.2. What are the implications for Hemel Hempstead with regard to development on land to the east within St Albans City and District? Is the proposed boundary of the East Hemel Hempstead AAP appropriate and justified? Have all the opportunities for development to the east of Hemel Hempstead been robustly explored?

10.2.1.No comment.

10.3. Are the local allocations (particularly LA1 and LA2) justified and are the principles for their development sound?

10.3.1. We raise no concerns with regards Local allocations LA1 and LA2 however we raise concerns with regards LA3 West of Hemel Hempstead, which is the largest of the Local Allocations. In our representations on the Pre-Submission consultation we have provided a comparative assessment between LA3 and our client's site at Shendish in Section 5.4 and Appendix 4.

10.3.2. The council's principal evidence base for the assessment of potential housing sites is the Assessment of Local Allocations and Strategic Sites Documents. The latest version is dated June 2012, but there have been versions of this document published previously. The Council's Sustainability Appraisal Report (9 September 2011) assesses the whole site but the Council has acknowledged in the past that there is a marked difference between the northern and southern areas of the site in terms of their suitability to accommodate development and this is reflected in the Assessment of Local Allocations and Strategic Sites documents, which assess the northern and southern parts of the site separately it concludes in respect of West Hemel (North):

"If greenfield development is required at Hemel Hempstead, this site is considered to warrant further consideration. It would be preferable to land to the south, as the northern slopes are less steep, development would be kept away from the lower valley slopes and there would be little or no impact on the Chilterns AONB."

10.3.3. In terms of our submissions on housing provision we consider that both West Hemel and Shendish are required and should be confirmed as proposed allocations in the Core Strategy. However, in a comparative analysis we have argued that the Council's proposed reliance on the southern part of the West Hemel allocation is questionable because of its sensitivity in landscape terms.

10.3.4. As landscaping is an important factor in determining the suitability of potential housing sites in Hemel Hempstead we submitted as part of our Pre-submission representations a detailed landscape assessment of the Shendish site and a comparison with the West Hemel site. The assessment concluded that whilst there are a number of landscape considerations to be taken into account in formulating an appropriate strategy at Shendish, the site is located within the most developed part of the Gade Valley whilst development at West Hemel Hempstead would result in a clear extension of the town into the Bulbourne Valley.

10.3.5. The impact of development here would be difficult to mitigate in the medium to long-term due to the visibility on the valley sides, especially in respect of the southern area. At Shendish on the other hand the existing mature character of the landscape would enable mitigation to be more effective and quicker without any major impacts on the wider countryside.

10.3.6. There are of course a range of other considerations to be taken into account and any land release will represent the outcome of a balance of them. As noted elsewhere in our submissions, the Council's the decision to reject the Shendish location is largely subjective but also reflects a number of inaccuracies and misconceptions.

10.3.7. In the final analysis the Council's conclusion is that *there are considered to be other greenfield options available that perform better against Green Belt and sustainability criteria*. We do not accept that conclusion, but in any event the position is that additional sites are required and in those circumstances our analysis and Sustainability Appraisal demonstrates that Shendish is a suitable and appropriate opportunity for allocation.

10.4. What public consultation has been undertaken with regard to LA2? Have the requirements of the Council's Statement of Community Involvement been met?

10.4.1.No comment.

10.5. Is the boundary of the Hemel Hempstead Town Centre appropriate and justified? Should there be reference to the provision of a bus station?

10.5.1.No comment.

10.6. Are the requirements for the Maylands Business Park (CS34) justified and consistent with the advice in Figure 18?

10.6.1.No comment.

10.7. Are the opportunities in The Grade Zone (Figure 17 on page 169) clear and do they incorporate sufficient flexibility?

10.7.1.No comment.

10.8. What is the Council's approach to development at Apsley (in particular Apsley Mills Retail Park). Is it appropriately reflected in the Core Strategy?

10.8.1.The proposed allocation at Shendish would maximise the potential of existing retail, employment, rail and bus based public transport and service facilities in Apsley. The proximity and accessibility of the site to the retail facilities on the London Road reinforces the sustainability of the proposed Shendish development.

10.8.2.To the extent that the development delivers additional physical and social infrastructure there will be indirect benefits for the areas as a whole. Similarly, it will help to maintain the vitality of the area and take advantage of any future improvements. Integrated with existing development at the Manor Estate (and its extension) and Rucklers Lane the scheme will help reinforce the neighbourhood concept of the town.

Principal Changes Requested

- **Increase in housing target to 13,500 to meet the requirements of the NPPF**
- **Focus of additional housing to be at Hemel Hempstead in accordance with the settlement hierarchy and spatial strategy**
- **Identification of Shendish as a development site for 900 dwellings in accordance with the principles in the proposals put forward by W Lamb Ltd**