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Issue 2 : 398370

## **Dacorum Core Strategy Public Examination**

### **Issue 2**

## **“The Distribution of Development (Settlement Hierarchy) and the Green Belt”**

**Submitted by**

**Sellwood Planning**

**on behalf of**

**Gleeson Developments Ltd**

**September 2012**

Regulated by RICS

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## **1.0 Introduction**

1.1 This statement has been prepared by Sellwood Planning on behalf of Gleeson Developments Ltd (398370). Gleeson has an Option over part of Local Allocation LA1 (Marchmont Farm, Hemel Hempstead) and supports the Council in its proposals for the residential development of this land.

## **2.0 (Q(2.1)) “What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the SA support the chosen hierarchy?”**

2.1 Since the East of England Plan (the RSS) remains part of the statutory development plan, the Dacorum settlement hierarchy must have regard to its policies and evidence base. Policy SS2 of the RSS seeks to direct most strategically significant growth to the major urban areas in the region and these are defined as the ‘Key Centres for Development and Change’ (KCDC) in Policy SS3. The only KCDC in Dacorum Borough is Hemel Hempstead and this correctly reflects its dominant role as the main centre of population, housing, services, facilities and public transport in the district.

2.2 Policy SS4 of the RSS identifies the market towns and larger villages as the next tier in the hierarchy, subject to local development documents defining the appropriate level of development in each settlement. As such, the evidence would support the identification of Berkhamsted and Tring as market towns. The Sustainability Appraisal supports the chosen roles for Hemel Hempstead, Berkhamsted and Tring.

2.3 Gleeson Developments Ltd does not have a view on the manner in which settlements have been categorised into tiers 3, 4 and 5 which, in many cases, turn on detailed local considerations.

### **3.0 (Q(2.2)) “Is the Site selection process based on appropriate criteria?”**

3.1 The selection of the Local Allocations and Strategic Sites was the result of a rigorous assessment process which was reported in the October 2010 document “Assessment of Local Allocations and Strategic Sites”. This was a three stage process where sites were sieved firstly to assess impacts on key environmental designations, secondly in terms of PPG2 impacts on the Green Belt and finally considered against wider sustainability criteria.

### **4.0 (Q(2.3)) “What is the justification for holding local allocations in reserve? What will be the process for bringing forward their release and is it set out in sufficient clarity?”**

4.1 There is no justification for holding the identified Local Allocations in reserve and Policy CS3 fails all of the four tests of soundness in paragraph 182 of the NPPF. This is because

- it is not positively prepared since it is a negatively phrased policy to prevent development occurring until specified tests are met
- it is not justified since the housing needs of Dacorum are greater than assumed in the submitted Core Strategy. To meet these housing needs, commitments, urban area sites, strategic sites and local allocations will all be needed from the start of the plan period
- it is not effective since it will delay the release of otherwise appropriate and sustainable sites capable of meeting housing needs in the Borough
- it is not consistent with national policy since it will impede the delivery of sustainable development and prevent the achievement of a ‘significant boost’ to the supply of housing (NPPF para 47).

4.2 Whilst it is accepted that all the Local Allocations are in Green Belt land, there is nothing in the NPPF which supports the concept of allocations being ‘held in reserve’. Dacorum Council appears to be confusing allocated site with safeguarded (but unallocated) land. Paragraph 85 of the NPPF makes it clear that safeguarding land

only relates to unallocated land which may be needed to “meet longer term development needs stretching well beyond the plan period”. This criterion does not apply to the Local Allocations.

4.3 Even if the concept of reserve sites was acceptable, the criteria for release set out in Policy CS3 are inadequate. The main criteria should be the extent to which the housing provision in the Core Strategy is being delivered and the existence of a five year supply of deliverable sites (plus a 5% or 20% buffer) in accordance with paragraph 47 of the NPPF.

4.4 Since it is considered that the principle of Policy CS3 is unsound, the best way to make the plan sound is to delete the policy in its entirety. However, if the policy is retained, there should be an additional criterion placed at the start of the list stating

**“(a) the extent to which the housing provision is being delivered and, the existence of a 5 years (plus appropriate buffer) supply of housing land”.**

**5.0 (Q(2.4) “Have the proposed amendments to the Green Belt boundary been properly justified and has the Council’s approach heeded national guidance? What are the exceptional circumstances that exist to justify such revisions?”**

5.1 Each of the proposed Local Allocations have been explicitly assessed against the (former) Green Belt criteria in PPG2. This was undertaken as part of the “Assessment of Local Allocations and Strategic Sites” (October 2010). This assessment itself followed earlier “Growth” consultations in 2006 and the emerging Core Strategy consultation in 2009. As a consequence, the proposed amendments to the Green Belt boundary to form the Local Allocations have been properly justified and consulted on.

5.2 The ‘exceptional circumstances’ (NPPF para 83) are the level of housing need in Dacorum in the period to 2031 and the evidence from the SHLAA that this cannot be achieved without some Green Belt releases. The effect of not releasing some land

from the Green Belt for housing purposes would be that Dacorum would fail the requirement in the NPPF (para 47) to meet “the full, objectively assessed needs of market and affordable housing in the housing market area”. Indeed, without Green Belt releases Dacorum would experience net out migration in the period to 2031.

**6.0 (Q(2.5) “Paragraph 83 of the National Planning Policy Framework refers to the permanence of the Green Belt in the long term so they should be capable of enduring beyond the plan period and Paragraph 85 refers to the identification of safeguarded land. How does the Core Strategy address the possible need to safeguard land? Should a review of the complete Green Belt boundary have been undertaken, including an assessment of whether or not there are any major developed sites (other than those in Table 2) that should be identified? Can the Council be confident that the Green Belt boundary will not have to be altered at the end of the plan period?”**

6.1 The proposed level of Green Belt releases identified by the Council to meet the housing provision in Policy CS17 is relatively modest. In this context, the Council’s decision not to undertake a full Green Belt review can be appreciated since the view was taken that, with modest changes, the Green Belt boundary would endure until after 2031.

6.2 However, if as a result of this public examination it is recommended that the housing provision needs to be increased, the balance of issues changes. If the recommended increase in housing numbers is not significant, it may be possible to make up the shortfall by increasing the dwelling provision on the Local Allocations such as Marchmont Farm. If the increase cannot be accommodated in this manner, the Sites Allocation DPD could be used as a means of identifying further releases of Green Belt land.

**7.0 (Q(2.6) “How and when will settlement boundaries be reviewed?”**

7.1 This is an issue which is primarily for the Council to answer, however it is assumed that this will form part of the Sites Allocations DPD.

**8.0 (Q(2.7) “Should limited infilling in selected villages in the Green Belt be restricted to only affordable housing for local people?”**

8.1 No comment.