



# **Dacorum Borough Council**

## **Local Planning Framework**

### **DACORUM CORE STRATEGY EXAMINATION IN PUBLIC**

**Statement by Dacorum Borough Council**

**Issue 6: Providing Homes**

**September 2012**

## **Purpose of this statement**

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

## Matters raised by Inspector

- 6.1 Are the housing policies consistent with national guidance and supported by clear and robust evidence? Is the identification of strategic sites and local allocations appropriate and is the status of SS and LA policies clear? There are no local allocations or strategic sites included for the Place Strategies for Kings Langley or the Countryside. Is this a satisfactory approach to take? How will the Council assess planning applications for development in these locations?
- 6.2 Is the information in the Strategic Housing Land Availability Assessment (2011) soundly based? Have current economic conditions been taken into account?
- 6.3 Is the apportionment of growth between settlements properly justified?
- 6.4 Is the overall housing provision based on a sound assessment of supply and demand? In particular:
  - a) will the Core Strategy meet the full objectively assessed needs for market and affordable housing in the Borough?
  - b) are the expectations for delivery of existing commitments reasonable?
  - c) is the proposed trajectory realistic and can it be delivered?
  - d) what assessment of previously developed land has been undertaken?; and
  - e) is there sufficient flexibility to deal with changing circumstances affecting phasing and delivery – in particular with regard to the economy and financial constraints, land ownership and infrastructure provision?
- 6.5 Bearing in mind the significant need for housing in the Borough, why was the higher growth option discounted?
- 6.6 What is the role of neighbouring local planning authorities in accommodating some of Dacorum's housing needs and can it be demonstrated that it is a role which they are undertaking?
- 6.7 Proposed minor change MC26 refers to a shortfall of 15% being used as a trigger for action by the Council. What is the justification for the 15% figure?
- 6.8 Should the Core Strategy establish the Council's overall approach to housing densities, as suggested in paragraph 47 of the NPPF?
- 6.9 How will the housing needs of villages in rural areas be met?

## Dacorum Borough Council's Response

**6.1 Are the housing policies consistent with national guidance and supported by clear and robust evidence? Is the identification of strategic sites and local allocations appropriate and is the status of SS and LA policies clear? There are no local allocations or strategic sites included for the Place Strategies for Kings Langley or the Countryside. Is this a satisfactory approach to take? How will the Council assess planning applications for development in these locations?**

6.1.1 The Pre-Submission Core Strategy's (Examination Document SUB1) housing strategy and policies are consistent with national guidance contained in the National Planning Policy Framework (Examination Document REG15). This is explained in more detail in the Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16) and in the responses to the questions below, in particular 6.4 – 6.6. Reference should also be made to the NPPF Compliance Checklist (Examination Document OT7).

6.1.2 Through its development strategy and housing policies the Core Strategy has sought to:

- deliver housing in the light of achieving sustainable development through its sustainable development strategy (paragraphs 6-7 of the NPPF);
- provide for a wide choice of homes (e.g. Policy CS18: Mix of Housing) (paragraphs 9 and 47 of the NPPF);
- promote the vitality of urban areas (e.g. Policies CS1: Distribution of Development, CS14: Economic Development and CS16: Shops and Commerce);
- encourage the use of previously developed land (e.g. Section 8: The Sustainable Development Strategy, in particular Policy CS2: Selection of Development Sites) (paragraph 17 of the NPPF);
- protect the Green Belt (e.g. Policy CS5: Green Belt) (paragraphs 17 and 79-90 of the NPPF);
- boost the overall supply of housing (e.g. Policy CS17: New Housing)(paragraph 47 of the NPPF);
- test objectively assessed needs for market and affordable housing against the evidence base underpinning the Core Strategy and housing land supply (paragraph 47 and paragraphs 158-159 of the NPPF) (see also response to Issue 7: question 7.1);
- engage with the local community and businesses and other key stakeholders at each stage of the Core Strategy (paragraphs 150 and 155 of the NPPF); and
- co-operate with neighbouring authorities on housing (e.g. as set out in the Statement Of Compliance with the Duty to Co-operate: Examination Document SUB8) (paragraph 55 of the NPPF).

6.1.3 The housing policies are also supported by a detailed evidence base that the Council has kept up-to-date, as far as is practical, in progressing the Core

Strategy. The key areas covered by the evidence base include:

- population (Examination Documents BP4 and BP6);
- housing capacity (e.g. the Strategic Housing Land Availability Assessment (Examination Document HG7));
- Strategic Housing Market Assessment (Examination Document HG12);
- housing need (e.g. Dacorum Housing Needs and Market Assessment Update: Examination Document HG17);
- housing land availability (e.g. Housing Land Availability Papers: Examination Documents HG9 and HG16);
- viability (e.g. Affordable Housing and Section 106 Viability Study: Examination Document HG11 and through developing the Affordable Housing SPD: Examination Document HG18 and CIL charging schedule);
- employment land supply (and the balance between jobs and homes) (Examination Documents ED1, Ed7, ED8 and ED12);
- infrastructure and the Community Infrastructure Levy (Examination Documents ID1, ID3 and ID5);
- the assessment of greenfield housing options (Examination Documents HG10 and HG15) ;
- Sustainability Appraisals (as summarised in SUB3 and SUB7);
- technical work on strategic sites and local allocations; and
- the outcome of consultation on housing growth and potential sites (summarised in SUB5 and SUB6).

6.1.4 The evidence base is comprehensive, proportionate and robust. It has helped guide, test and provide support for important decisions on housing growth. Furthermore, the independent work on the housing strategy undertaken through the Sustainability Appraisal concluded that the overall approach adopted was acceptable (paras. 6.3.1- 6.3.2 and 6.5.1 – 6.5.2 in the Sustainability Report: Examination Document SUB3). (See also response to Issue 1: question 1.3). The SA concluded that:

- Policy CS1: Distribution of Development should provide a good balance between development in key settlements and the smaller settlements and rural areas.
- Policy CS2: Selection of Development Sites was predicted to have mainly positive effects against the majority of the SA objectives, particularly in terms of reducing the need to develop in the Green Belt, protecting local landscapes and in prioritising previously developed land.
- Policy CS3: Managing Selected Development Sites would ensure that all development is well located and accessible and would also help improve the vitality and viability of settlements.
- Policy CS17: New Housing would help meet the needs for both new housing and affordable homes, support the planned job expansion in Maylands and regeneration in Hemel Hempstead, and will help to maintain the viability of existing services whilst also encouraging the provision of new and expanded facilities.
- Policies CS18: Mix of Housing, CS19: Affordable Housing and CS20: Rural Sites for Affordable Homes were seen as having some significant positive

effects against the social objectives through promoting equality and social inclusion.

6.1.5 The Council considers that the identification of strategic sites and local allocations (see Table 9 and the Place Strategies in the Core Strategy: Examination Document SUB1) is appropriate and their status in policy terms is clear. The Core Strategy has only designated local allocations and strategic sites where they fulfil specific purposes and where fundamental to the delivery of the Place Strategies. Such conditions do not exist for Kings Langley and the Countryside, as explained below.

6.1.6 The role of strategic sites is explained in paragraph 8.16 of the Pre-Submission Core Strategy and within the glossary (Appendix 4). Their boundaries are shown on the updated Proposals Map (Examination Document SUB2) and on the Vision Diagrams within the Berkhamsted and Markyate Place Strategies. Strategic sites are sites within the existing settlement boundary of urban areas that are available for development now. Their suitability has been tested through the Core Strategy process, given their importance to each settlement and the local issues they have generated. Both strategic sites are underpinned by master plans and technical work (Examination Documents SS1 and SS2), and SS2: Hicks Road, Markyate already benefits from planning permission (see Issue 16: question 16.1). Further information regarding site SS1: Land at Durrants Lane / Shootersway, Berkhamsted is provided under Issues 11: question 11.2.

6.1.7 Local allocations are referred to in Policies CS2: Selection of Development Sites and CS3: Managing Selected Development Sites. They are identified on the Vision Diagram of the relevant Place Strategies through the use of a house symbol. Their purpose is explained in paragraphs 8.13-8.16, 19.5-19.7 and 14.22 and within the glossary (Appendix 4) of the Core Strategy. Local allocations are extensions to existing settlements, where the Council has accepted that, on balance, there is a need for a limited Green Belt release. Council has only identified local allocations on the basis that exceptional circumstances exist to accommodate growth in the Green Belt. In all cases, the sites have been tested against all reasonable alternatives (Assessment of Potential Local Allocation and Strategic Sites: Examination Document HG15), subject to consultation (Report of Consultation: Examination Document SUB6), and have been assessed against a series of sustainability objectives through a Sustainability Appraisal process (Examination Document SUB3, SUB7 and CS19). All are supported by technical work and/or statements of common ground (Examination Documents SG1-3 and SG5-8).

6.1.8 Policies CS2: Selection of Development Sites, CS3: Managing Selected Development Sites and paragraphs 8.13-8.16 of the supporting text explain how local allocations will be considered. The Pre-Submission Core Strategy makes clear how local allocations are to be implemented and explains that the detailed requirements and timing of development will be set out in the Site Allocations DPD. This is covered in more detail under Issue 2: question 2.3 in response to their role as housing land reserves.

6.1.9 The Council believes it has set out a clear and reasonable approach to strategic

sites and local allocations. However, it is willing to make further editorial changes to the Pre-Submission Core Strategy if helps improve understanding within sections 8 and 14. Furthermore, the Council can add additional text to Section 19: Introduction to the Place Strategies to further explain the role and status of these designations and in particular, the expectation that the requirements set out are implemented.

6.1.10 Opportunities for change are restricted in Kings Langley and the countryside, as explained in the responses to respectively Issues 13 and 16. Large scale opportunities in these locations (particularly on greenfield sites) are not currently justified in terms of land supply and the development strategy, and none are anticipated. Alternative levels of development have already been considered and sites assessed, but have not warranted the identification of a strategic site or local allocation.

6.1.11 The compact and sensitive nature of Kings Langley, whose Green Belt is constrained by the major towns of Hemel Hempstead and Watford, limits opportunities. Primary school capacity also imposes a natural limit to the level of development that can be accommodated. There are no suitable locations available for a strategic site. Much development has come forward already (e.g. redevelopment of the former Ovaltine factory) and more is planned in the Three Rivers side of the village. This further reduces the need for additional housing. The smaller rural villages and the surrounding countryside are similarly sensitive to development and would also have difficulties accommodating significant new housing development. The countryside is identified within the Settlement Hierarchy: Table 1 as an 'Area of Development Restraint,' (see response to Issue 16: Countryside for further explanation of the reasons for this restraint).

6.1.12 The Pre-Submission Core Strategy does allow for further local allocations, though it does not envisage the need for these. However, should a suitable (and justified) site come forward, the Pre-Submission Core Strategy is sufficiently robust and flexible to deal with this. There is no reason why this could not be progressed through the Site Allocations DPD in advance of a planning application. For smaller-scale proposals, the Council would apply relevant planning policies and take into account other material planning considerations. Smaller-scale greenfield development in the countryside may come forward under Policy CS20: Rural Sites for Affordable Homes in the selected rural villages (see response to question 6.9 below).

## **6.2 Is the information in the Strategic Housing Land Availability Assessment (2011) soundly based? Have current economic conditions been taken into account?**

6.2.1 The Council is confident that the information in the Strategic Housing Land Availability Assessment (SHLAA) (Examination Document HG7), and subsequent land availability papers (Examination Documents HG9, HG13 and HG14) is soundly based and takes into account current economic conditions (see also response to question 6.4 below). The original SHLAA has been continually refined and subject to regular monitoring. The latest version of the land availability assessment (as at 1<sup>st</sup> April 2011) can be found in the 2010/11 Annual Monitoring

Report (Examination Document BP2).

- 6.2.2 The SHLAA follows and builds on earlier work in the Urban Capacity Study (January 2005) (Examination Document HG2). It was completed in accordance with guidance from the Planning Officers Society and Llewelyn Davies (Strategic Housing Land Availability Assessments Practice Guidance), and against advice contained within (the then) PPS3: Housing (paragraphs 54-56).
- 6.2.4 The SHLAA sites were subject to consultation through the Site Allocations DPD (Issues and Options Stage: Examination Documents SA5 and SA6) and to sustainability appraisal (Examination Documents SA3 and SA4).
- 6.2.3 A market view was sought from the development sector to test the methodology, assumptions and conclusions on housing sites in the original SHLAA through a Stage 2 Review of the SHLAA in 2010 (Examination Document HG13). This provided a key opportunity to discuss the SHLAA's approach to different categories of sites and their deliverability and developability, and to consider broader market conditions.
- 6.2.4 The process involved both a wider discussion with the development sector (e.g. local land agents, house builders and Registered Providers) and a more focussed sub-group through the establishment of a SHLAA panel. The latter debated the merits of different site typologies using representative SHLAA sites.
- 6.2.5 The conclusions from the work as a whole helped formulate a number of potential improvements and a series of action points for the Council in taking forward the findings of the SHLAA. No fundamental change was considered necessary. The action points included a commitment to regularly reviewing the SHLAA, improving the level of information on individual sites, the need to assess the suitability of sites against the wider evidence base, and in taking a more cautious approach to certain types of sites (e.g. employment land and urban open spaces).
- 6.2.6 The Council has sought to further test and make more rigorous the findings of the SHLAA. It has considered more detailed questions of land availability through the Housing Land Availability Papers (April 2009 and July 2011) (Examination Documents HG9 and HG14). The former took a number of decisions on both groups of SHLAA sites (such as small opportunity sites and greenfield sites) and individual sites in terms of their phasing and suitability (some sites were brought forward while others were discounted (unphased)).
- 6.2.7 The Council has regularly updated the SHLAA as part of the monitoring of the housing supply through the Annual Monitoring Reports (AMRs) taking into account the outcomes of both the Stage 2 review of the SHLAA and the Housing Land Availability Papers, as part of the process. This has included:
- updating the status of sites against the latest housing land position statement (Examination Document HG20);
  - discussions with landowners (e.g. the Council's Estates team, County Council, Crown Estate and Homes and Communities Agency etc.); and
  - using other available information (e.g. that supplied by the Council's Strategic

Housing team on the delivery of affordable housing sites).

6.2.7 The Council is confident that the SHLAA and its updates are robust taking into account current economic conditions (and other information). Although the SHLAA does not apply a discount rate to take account of potential non-delivery of sites, appropriate flexibility is built in through taking a cautious approach to site identification, conservative estimates of site capacity and by ensuring site information is reviewed and updated on an annual basis (through the AMR process). Large windfall sites are currently excluded from the Council's land supply assumptions and have the potential to provide an additional source of housing supply.

6.2.8 Economic conditions will of course vary over the lifetime of the Core Strategy. At times of recession there may be an under-delivery against the housing target, with trends reversing when economic conditions improve. Individual sites will also be affected by site-specific factors. One of the major concerns affecting delivery recently, but outside of planning control, has been the lack of access to developer funding and mortgages for first time buyers. Ultimately, the Council can only demonstrate that there is a reasonable rather than absolute prospect that a site will be brought forward (especially those in the later phasing periods of the SHLAA). Often the problem with a site is predicting its timing rather than a fundamental problem with its suitability.

6.2.9 Despite the effects of the recession, sites identified within the SHLAA have continued to contribute to housing supply. Several of these have been large e.g. redevelopment of the former Sappi paper mill site and the extension to the Manor Estate in Apsley, indicating that some market confidence remains. It should also be seen against the fact that sufficient housing in the Borough has been delivered to meet the housing target in the Dacorum Borough Local Plan (Examination Document OT1) and to ensure a steady supply against the target in the Core Strategy. Furthermore, the SHLAA consultants did highlight that:

*"..experience from elsewhere suggests that when sites feature in capacity studies, their very identification for development can trigger landowner or developer action, thus creating a 'self-fulfilling prophecy'."* (paragraph 3.1.8 of the SHLAA: Examination Document HG7).

This is likely to help in bringing forward sites, especially given the general attractiveness of the local housing market for developers and landbuyers. A small number of agents/developers have shown an interest in assessing development opportunities by pursuing sites in the SHLAA.

6.2.10 The Council has specifically tackled the subject of the recession with the development sector as part of work on the Stage 2 Review of the SHLAA (paragraphs 3.2 - 3.7 of Examination Document HG13). However, only relatively minor suggestions were made by the developer panel as to how the Council should temper the SHLAA to reflect the economic downturn e.g. greater flexibility over developer contributions. This may have been a result of general optimism amongst the SHLAA Panel that there would be a short to medium term recovery, leading to an upturn in supply.

6.2.11 In reality, there is much the Council can do to support the delivery of SHLAA sites. This includes, where appropriate, intervening to help unblock sites; being more flexible in the negotiation of developer contributions and levels/mix of affordable housing; supporting and guiding schemes through the development process; and looking at the potential of SHLAA sites in its own ownership. Paragraph 3.37 of the Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16) provides a more comprehensive list of potential actions. Some of these potential actions are included as part of proposed minor change MC26 (Examination Document SUB5). The response to Issue 7: question 7.1 outlines the actions the Council is taking to boost the supply of affordable homes.

6.2.12 It is also important to recognise that the Council is not dependent on the absolute delivery of all SHLAA sites. While some identified sites may remain undeveloped (or are delayed), there are other sites that can and are coming forward in their place to offset non-delivery. These include sites where the Council has had active discussions with developers and landowners e.g. as part of seeking pre-application advice (referred to as ‘New Sites (non SHLAA sites)’ in Appendix 2 to the AMR: Examination Document BP2). Such sites should be included as part of the housing supply (alongside existing SHLAA sites) where they are suitable on planning grounds and where there is a reasonable prospect of them being delivered. As noted above, land windfall sites also offer a potential additional source of supply.

### **6.3 Is the apportionment of growth between settlements properly justified?**

6.3.1 The issue of the growth of settlements is addressed in the response to Issue 2: Distribution of Development (Settlement Hierarchy) and the Green Belt, and in response to questions relating to individual Place Strategies under Issues 10 - 16.

6.3.2 The Council considers that the level and distribution of growth is properly justified in planning terms. This issue is tackled in some detail in Chapter 3 of the Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16) particularly:

- paragraphs 3.46 – 3.50 (location and distribution);
- paragraphs 3.64 – 3.73 (infrastructure); and
- paragraphs 3.74 – 3.84 (environmental effects).

It has looked carefully at the sensitivities of the towns and large villages to development and tested levels of development against the evidence base and community views in determining an indicative housing figure for each settlement.

6.3.3 As explained in paragraph 19.4 and illustrated in Table 8 of the Pre-Submission Core Strategy (Examination Document SUB1), the levels of growth apportioned to each settlement are indicative local objectives, rather than absolute targets. The Council is however keen to ensure that all settlements make an appropriate contribution to meeting the overall housing target, relative to their function and character and the potential opportunities for change which they can reasonably

accommodate. The distribution reflects the Borough's settlement hierarchy (Table 1 in the Core Strategy). The detailed proportion of development will therefore vary across the towns, large villages and the countryside in accordance with this hierarchy.

6.3.4 Levels of growth have been tested against initial work on local population change (Examination Document BP4) and on-going work regarding land availability through the housing land availability papers and Annual Monitoring Reports (respectively Examination Documents HP9, HG14 and BP2). A number of dwelling projections have been published during the course of developing the Core Strategy and all differ (see Table 3.1 of Examination Document HG16 for a summary).

6.3.5 Different development levels have also been tested throughout the Core Strategy process against community views (see paragraphs 3.85 - 3.97 of Examination Document HG16), infrastructure capacity (Examination Documents ID1, ID3 and ID5) and against sustainability objectives at each stage of the Core Strategy. The Sustainability Appraisal has supported the Pre-Submission Core Strategy with regards to the strategic distribution of growth (under Policy CS1: Distribution of Development) and the local levels of distribution (through each Place Strategy) (see Examination Documents SUB3 and SUB7 and response to Issue 1: question 1.3).

6.3.6 What the Council has not sought to do is to apportion growth levels by a percentage rate. This would be too blunt an approach and would not properly reflect the character and capacity of individual settlements to absorb development.

**6.4 Is the overall housing provision based on a sound assessment of supply and demand? In particular:**

**a) will the Core Strategy meet the full objectively assessed needs for market and affordable housing in the Borough?**

**b) are the expectations for delivery of existing commitments reasonable?**

**c) is the proposed trajectory realistic and can it be delivered?**

**d) what assessment of previously developed land has been undertaken?; and**

**e) is there sufficient flexibility to deal with changing circumstances affecting phasing and delivery – in particular with regard to the economy and financial constraints, land ownership and infrastructure provision?**

**a) meeting the full objectively assessed needs for market and affordable housing**

6.4.1 The housing supply is based on a sound assessment of supply and demand. This is dealt with in more detail in Chapters 3 and 4 of the Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16) and also in the response to Issue 7: question 7.1 on affordable housing.

6.4.2 The Council acknowledges that the housing target (Policy CS17: Housing Supply) and housing programme (Table 8) in the Core Strategy (Examination Document

SUB1) will not satisfy recent household projections (c.13,500 homes – CLG 2008 based household projections). Nor will it be sufficient to deliver on levels of housing needs identified in the Strategic Housing Market Assessment (Examination Document HG12) (c. 5,500 homes to 2031) and subsequent local housing needs assessments.

6.4.3 Household projections should not be interpreted as equating to full objectively assessed market housing needs under paragraph 47 of the National Planning Policy Framework (Examination Document REG15). Furthermore, it is important that account is taken of the full requirements of the advice that goes on to say:

*“.....,as far as is consistent with the policies set out in this Framework...”*

The Government is not asking the Council to deliver unrestrained housing demand or even full demand, but objectively assessed housing needs. Put another way, meeting full objectively assessed demand is not the same as meeting unconstrained demand. Household and population forecasts are only one element of assessing objectively assessed need.

6.4.4 The Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16) considers the issue of objectively assessed housing need in some detail (paragraphs 3.3 – 3.25). It concludes that inevitably objectively assessed housing need could cover a range of figures (Table 3.2 in Examination Document HG16). There is concern over the modelling used, and that the models are over-reliant upon the extrapolation of short-term trends.

6.4.5 The key point is that forecasts vary according to the assumptions used, especially regarding household size and in-migration. A broader discussion of this can also be found in the ‘Population Projections and The Core Strategy’: Examination Document BP6). The Council is concerned that these assumptions may over-exaggerate these factors and hence inflate what is an appropriate level of need to meet. It has therefore had to consider:

- To what extent is it reasonable to assume a continuing decrease in household size?
- To what extent is it reasonable to assume a significant level of in-migration (and outward expansion into the Green Belt as a result)?

6.4.6 With regards to household size, the initial results from the ONS 2011 Census have been published:

[http://www.ons.gov.uk/ons/dcp171778\\_270487.pdf](http://www.ons.gov.uk/ons/dcp171778_270487.pdf)

These results reveal that average household size in England and Wales is actually stabilising at 2.4 residents per household over the last 20 years, following successive years of decline. This would suggest that care needs to be exercised in relation to projecting forward assumptions about declining household size and its implications for household forecasts.

6.4.7 The Council sees CLG’s household growth projection as being the highest of a

range of models. The Core Strategy housing target of 430 dpa (10,750 over 25 years) is within the range of objectively assessed housing needs, as is the housing programme with its local objectives set out in Table 8. The latter anticipates about 11,320 dwellings being delivered over the lifetime of the plan.

6.4.8 Housing demand should not be pursued in isolation. The proper test is whether the Core Strategy is meeting the full objectively assessed housing needs as far as is consistent with the policies as a whole in the NPPF (paragraph 47). In the case of Dacorum, the Council has reflected on all factors that make up the evidence base and other local circumstances in setting a housing target. It has taken into account the ability of the Borough to accommodate growth, particularly in respect of:

- the constraints of the Green Belt (in recognising there will be some net out-migration and in accepting some degree of development restraint);
- its high quality landscape and countryside;
- the character and setting of towns and villages;
- the environmental effects of new development;
- infrastructure capacity; and
- community views.

6.4.9 The Council has carefully assessed the implications of higher growth levels, before concluding it would be unsuitable and difficult to deliver. It has appraised a range of housing options, including a higher (demand-led) level of growth (i.e. 500 dwellings per annum). The Council recognised that a higher option had some merit: it was more closely aligned with the CLG's latest household projections, would deliver more housing (particularly affordable homes), would help support the local economy and regeneration objectives, and better reflect the views of many landowners and developers (paragraphs 4.9 and 5.8 of Examination Document HG16).

6.4.10 However, the Council was concerned over the adverse impacts of meeting a demand-led housing scenario. There would be a growing cost in achieving such levels of development. This would require a significant increase in housing delivery over past rates of around 50% (Table 3.7 Examination Document HG16). Not only would there be the need for an even more significant step-change in delivery rates that would be required to deliver the 430 dwelling per annum target, but it would result in the need for a larger greenfield land take (Table 3.6, Examination Document HG16). This would have serious implications for the core planning principle, of protecting the Green Belt (fifth bullet point, para. 17 of the NPPF).

6.4.11 The evidence base pointed to growing demands on and cost of social, physical, and transport infrastructure with higher levels of housing, especially for Hemel Hempstead (paragraphs 3.64-3.73 of Examination Document HG16) (see also response to Issue: 17, question 17.1). This was particularly the case in respect of the local and strategic road network and in accommodating new school places in the Borough (see also response to Issue 8: question 8.2 with regards to schooling). The Place Strategies have attempted to respond to the broad capacity of infrastructure and the ability of settlements to accommodate new development, but there will still be challenges to overcome (this is explored

further in the response to Issues 10-16 regarding the individual Place Strategies).

6.4.12 The Council was concerned over the environmental effects of demand-led housing on the Borough (paragraphs 3.74–3.84 of Examination Document HG16), particularly the urbanising impact of development. This was especially the case in terms of its countryside and high quality landscape (e.g. the Chilterns Area of Outstanding Natural Beauty), in safeguarding nature conservation designations (e.g. the Chilterns Beechwood Special Area of Conservation) and the character and setting of settlements (and their urban fringe). Higher levels of growth were tested through the Sustainability Appraisal process and this work highlighted increasing adverse effects (see paragraphs 3.81-3.82 of Examination Document SUB3).

6.4.13 The Council has also consulted on housing growth during the plan preparation (paragraphs 3.85–3.97 of Examination Document HG16). The Sustainability Appraisals supporting the Core Strategy at each stage were also subject to consultation. No clear consensus of views emerged, but there was strong local opposition to higher levels of growth. This reflected local sensitivities over the effects of new development on local infrastructure capacity and the impact upon the character of settlements.

6.4.14 Of the low (370 dpa), medium (i.e. the housing target of 430 dpa) and higher growth options (+500 dpa) tested, the mid-level was considered to lead to a sound strategy. It delivers a more balanced approach to addressing demand and need taking into account the evidence base and local circumstances.

6.4.15 430 dpa represents a major improvement on the delivery of market and affordable housing at the higher end of a range of objectively assessed demand. This level of growth can be satisfactorily delivered while limiting the impact on the Green Belt and the environment. The housing target is better aligned with more recent jobs forecasting (Examination Document ED12) and it can still help support the local economy and regeneration aims. Technical work indicates that in terms of infrastructure, there are no absolute constraints to the amount of development proposed at this and lower levels. It takes into account land availability and recognises that more could be delivered if full account is taken of windfalls. In addition, the sustainability appraisal demonstrated that, on balance, the option was appropriate (Paragraph 6.5.1.1 of Examination Document SUB3).

#### **b) the delivery of existing commitments**

6.4.16 The Council considers that the expectations for delivery of existing commitments (and other identified sites) is reasonable. Reference should also be made to question 6.2 above, as the Strategic Housing Land Availability Assessment (SHLAA) (Examination Document HG7) and its updates form an integral part of the housing land supply underpinning the trajectory.

6.4.17 The Council is confident, as far as it is possible to be, that existing commitments will be delivered. However, despite its best endeavours, it cannot guarantee the timing and implementation of all commitments, especially given current market

conditions. As discussed above, the Council can only demonstrate that there is a *reasonable* rather than *absolute* prospect that commitments will be brought forward.

6.4.18 It regularly monitors the housing supply through the land position statements and Annual Monitoring Reports (Examination Documents HG20 and BP2), and consequently has a good understanding of site delivery. It is committed to detailed monitoring of the Core Strategy (see response to Issue 17: question 17.4). The Council has tested the validity of the SHLAA sites through a further Stage 2 review, consultation, market testing with the development sector and close monitoring (see question 6.2 above). It has also assessed the delivery of commitments and other components of the housing supply through the Housing Land Availability Papers (Examination Documents HG9 and HG14).

6.4.19 The delivery of commitments (and by default, the housing trajectory) should be seen positively in the light of current levels of completions and future land supply generally. Recent completions and future supply have been, and continue to be healthy. The 2010/11 AMR (Examination Document BP2) indicates a 5 year housing supply.

6.4.20 Despite the current market downturn, sufficient housing in the Borough has been delivered to meet the housing target in the Dacorum Borough Local Plan (Examination Document OT1) and to ensure a steady supply against the target in the Core Strategy. The current land position statement (1<sup>st</sup> April 2012, Examination Document HG20) points to recent completions almost in line with the current Core Strategy housing target:

**Table 6.1 Housing completions 2006 - 2012**

Period	Net completions
2006/07	400
2007/08	384
2008/09	418
2009/10	237
2010/11	603
2011/12	447
<b>Average annual rate 2006 - 12</b>	<b>418</b>

This would support the view that the housing target has been set at a realistic level to enable delivery.

6.4.21 The latest land position statement highlights a high level of commitments (planning permissions and sites subject to the completion of legal agreements) in the Borough (1,945 dwellings (net)). This includes the contribution from a number of large sites many of which are under construction:

**Table 6.2 Large committed housing sites (as at 1<sup>st</sup> April 2012)**

Application No.	Address	Net capacity	Status
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506/09	New Lodge, Bank Mill Lane, Berkhamsted	53	Not started
2419/04 and 745/10	Land at Manor Estate, Hemel Hempstead	362	Under construction
1382/09	Former Sappi site, Lower Road, Hemel Hempstead	450	Under construction
692/09	Land at Green Lane, Hemel Hempstead	88	Not started
1477/09	Land at NE Hemel Hempstead	357	Pending legal agreement
1173/11	Land at Hicks Road, Markyate	75	Pending legal agreement

Furthermore, other larger identified schemes are likely to come forward in the short to medium terms including land at Westwick Farm, Hemel Hempstead (50 homes) and Strategic Site SS1 land at Durrants Lane / Shootersway, Berkhamsted (180 homes).

6.4.21 The position on recent completions and land supply would imply that there is overall confidence in the housing market to bring forward and deliver sites through the planning system.

6.4.22 The Council acknowledges that some sites will be deferred or not come forward. Equally, some sites will come forward earlier or be replaced by other sites emerging through the development management process. The Council can do much to unblock sites and bring forward land in its ownership (as set out in paragraph 3.37 of Examination Document HG16). It is working hard to improve the supply of affordable housing sites which will benefit overall supply (see response to Issue 7: question 7.1).

6.4.23 The land supply includes a contribution from windfalls (i.e. from small new builds and conversions). However, no contingency has been made for larger windfalls (which have proved important in the past e.g. the former Kodak Tower (441 homes) and Sappi Graphics, Hemel Hempstead (450 homes)). There is no reason why they will not come forward in the future and help maintain supply. In addition, the NPPF (paragraph 89) now allows greater flexibility over the redevelopment of previously developed site and this should also contribute (albeit modestly) to housing supply.

6.4.24 Close monitoring of development and managing the five year supply will help identify the need for any remedial actions should short-term housing supply falter. The Council has the ability to bring forward local allocations (Policy CS3 in the Core Strategy) if required. This provides further flexibility to the housing supply.

### **c) the realism and delivery of the proposed trajectory**

6.4.25 The Government requires Councils to illustrate the expected rate of housing delivery for the plan period through a housing trajectory (paragraph 47 of the NPPF). This housing trajectory is dependent on a number of components and

assumptions being realised (as already explored above). It is a best estimate at a particular point in time, based on local information. The trajectory takes a longer-term view of housing delivery, and it is the contribution from later phases that is the most difficult to predict with any certainty. Conditions will vary over the lifetime of the plan which makes the delivery of sites unpredictable.

6.4.26 Whilst the Council is confident that the housing target will be delivered, it acknowledges that the trajectory may vary (particularly over the latter part of the plan-period). It represents a realistic rather than absolute picture of projected completions.

6.4.27 As mentioned above, recent completion rates have been good, there is a healthy pool of commitments and other larger sites are coming forward, the land supply and assumptions underpinning the trajectory will be subject to close monitoring, the five year supply will be carefully managed, there is scope for other sites to come forward (e.g. large windfalls), and there is flexibility to respond should the delivery of sites under perform. These factors will help ensure delivery of the trajectory.

6.4.28 For the reasons summarised in paragraph 6.4.27, the Council considers that an allowance for the non-delivery of sites is not warranted. This issue is also discussed in paragraphs 3.48 – 3.53 of the Housing Land Availability Paper (April 2009) (Examination Document HG9). The previous Local Plan Inquiry Inspector considered the necessity for a non-implementation allowance (paragraphs 7.4.91 – 7.4.97, Inspector's Report to the Dacorum Borough Local Plan 1991 – 2011 Public Local Inquiry (Examination Document OT9). He also concluded that, on balance, a discount was not justified for a number of reasons including:

- the number of dwellings built had consistently exceeded the Structure Plan targets despite the fact that some identified sites had not been implemented;
- the Borough was an area of high demand;
- there was no clear evidence that the Local Plan target would not be achieved; and
- the requirement for a rolling programme of local plan reviews would substantially reduce the need to make provision for a discount. It would enable additional housing sites to be brought forward more quickly if completions fell significantly below the predicted level.

#### **d) assessment of previously developed land**

6.4.29 Previously developed land (PDL) will be the chief component of the housing target (see Tables 3.4 and 3.6 of Examination Document HG16) - the principal source of this being urban land within the settlements. The Council has sought to optimise this contribution from the urban areas, but there is a need for greenfield sites if higher levels of housing is to be achieved. PDL is seen as contributing more significantly in the earlier part of the plan with an increasing role for greenfield (local allocations) in the latter part. However, the Annual Monitoring Report highlights that PDL has dominated supply in recent years (see Table 6.3 below).

**Table 6.3 Housing completions on previously developed land 2006 - 2011**

<b>Period</b>	<b>% completion of PDL</b>
2006/07	99
2007/08	99
2008/09	96
2009/10	94
2010/11	99

Source: Section 7, Technical Appendix, 2010/11 Annual Monitoring Report

- 6.4.30 The Council has assessed the role of PDL in a number of ways. The SHLAA looked at the role of urban sites in identifying future housing potential. The study identified a range of PDL opportunities from small windfalls, employment land, redevelopment of vacant community sites, and town and local centres etc. The work highlighted a strong contribution from PDL in the first ten years but noted a complete absence of any urban capacity in the later phasing periods of the SHLAA (i.e. years 11-16 and 16-20). This reflected the practical difficulties of identifying such sites in the long-term.
- 6.4.31 The initial findings of the SHLAA (Examination Document HG7) were further tested through the Stage 2 Review (Examination Document HG13) in seeking a market view on different types of urban sites and the methodology and assumptions behind them (see response to question 6.2 above).
- 6.4.32 The work on the Site Allocations DPD at the Issues and Options Stage in 2006 and 2008 (Examination Documents SA1 – SA9) has also provided an indication of the potential contribution from PDL, both in terms of sites identified and new sites emerging from the consultation process. The individual identified sites were systematically appraised against a range of criteria. This has allowed the Council to assess the suitability of sites to be taken forward, although not all sites have proved acceptable. PDL sites continue to be put forward by landowners and developers, and these too will need to be appraised in progressing to the Pre-Submission stage (programmed for spring 2013).
- 6.4.33 The baseline data provided by the SHLAA and the contribution from PDL and urban sites generally was further analysed through the Housing Land Availability Papers (Examination Documents HG9 and HG14). This work tested the likely level of contribution from identified sites, potential locations and the role of small windfalls within the urban capacity (including PDL sites). It looked at the different components of the land supply (e.g. their location and capacity) and factors affecting their delivery.
- 6.4.34 All of the above has been regularly monitored through the housing land position statements and the AMR. This has provided a good understanding of the delivery of small new build sites and conversions, and when larger windfalls have come forward. The work has fed into the production of the five year housing land supply calculations and the housing trajectory. However, it is difficult to undertake any specific testing of some categories of PDL (e.g. redevelopment of PDL in the Green Belt), because of their sporadic nature and

the uncertainty over what use would come forward.

- 6.4.35 Given the Council's views on housing supply set out above, it is therefore confident that high levels of PDL can be delivered.
- 6.4.36 The Council is confident that there is sufficient flexibility to deal with changing circumstances affecting phasing and delivery. This is a much wider issue affecting the delivery of the Core Strategy as a whole. The approach to implementation and delivery is set out in Section 27 of the Pre-Submission Core Strategy and is also covered in the response to Issue 17: question 17.4. The former highlights a number of areas of flexibility (paragraph 27.12) and available mechanisms (paragraph 27.14) to ensure delivery (examples are given below).
- 6.4.37 There is flexibility built into the Pre-Submission Core Strategy, as far as is reasonable and practical, but not all circumstances can be planned for or foreseen over the whole of the plan period. As mentioned above, there are some external factors that affect delivery that the Council can do little about to rectify (e.g. the availability of development funding and access to mortgages for first time buyers). However, the Government and other bodies (e.g. the Homes and Communities Agency) can have a positive role in assisting with delivery and this must not be overlooked.
- 6.4.38 There is flexibility in terms of housing delivery, and the Council has an important role to play. The viability of a scheme can be tested to ensure the delivery of development. Where appropriate, there is flexibility over the level and mix of affordable housing or to allow for a financial contribution instead (Policy CS18: Mix of Housing and CS19: Affordable Housing). An element of market housing could be supported on rural affordable housing sites, if justified on viability grounds. Any future Community Infrastructure Levy (CIL) charges will be set at a fair and reasonable level taking into account both viability and delivery.
- 6.4.39 It is important that the Council carefully monitors and manages housing supply, particularly the five year supply, to ensure that, if required, it puts in place prompt and timely remedy so as to avoid the need for major action. Policy CS17 provides a clear trigger for action should the housing supply underperform. In this respect Policy CS3 allows for local allocations to be managed and brought forward earlier if required.
- 6.4.40 There is also flexibility over delivering the housing target if full account is taken of smaller windfalls (i.e. the housing programme under Table 8). The Pre-Submission Core Strategy takes no long term account of larger windfalls, which have proved an important source of housing land in recent years. There is therefore potential to modestly deliver above the housing target and/or to provide replacement development opportunities should identified sites be deferred/not come forward.
- 6.4.41 The Council has a good understanding of infrastructure capacity (e.g. through the Infrastructure Delivery Plan), within and outside the district, through liaising with relevant providers and in discussion with neighbouring authorities and the County Council. It has carefully planned the amount, timing and location of

development to ensure the demands on infrastructure can be met and financed. The Council has also sought site-specific information on the strategic sites and local allocations to ensure infrastructure is adequate and/or will be provided in each case. Key infrastructure requirements have been set out for each site, following advice from infrastructure providers, and discussed with landowners. This should help ensure the timely delivery of sites and also minimise the need for contingencies.

**6.5 Bearing in mind the significant need for housing in the Borough, why was the higher growth option discounted?**

6.5.1 This issue is discussed in detail in Chapters 3 and 4 of the Background Paper – Selecting the Core Strategy Housing Target (Examination Document HG16) and referred to in response to question 6.4 above and Issue 1: question 1.3.

6.5.2 In summary, the Council has sought to appraise a range of housing options, including against a higher (demand-led) growth (i.e. 500 dwellings per annum). The higher option had some merit in that it would more closely align with the latest CLG household projections, would deliver more housing (particularly affordable homes), and better reflect the views of many landowners and developers.

6.5.3 However, the Council was concerned over the significant increase in housing delivery that would be required and the resultant impact on the Green Belt. There was strong local opposition to higher levels of growth. The Council had concerns over the validity of the population and household forecasts underpinning the higher growth option. The evidence base pointed to the growing adverse impacts on local character, infrastructure capacity and significant adverse effects on landscape and townscape sustainability objectives. Of the options assessed, a medium level of growth (430 dpa) was considered to deliver a more balanced approach to demand and need.

**6.6 What is the role of neighbouring local planning authorities in accommodating some of Dacorum's housing needs and can it be demonstrated that it is a role which they are undertaking?**

6.6.1 As set out in response to question 6.4(a) above, the Council considers that the Pre-Submission Core Strategy (Examination Document SUB1) will enable the area to meet its objectively assessed needs. The Regional Strategy (Examination Document REG 7) advocated a diversion of growth away from south west Hertfordshire towards the Aylesbury and Milton Keynes growth areas and a focus of remaining development on New Towns (including Hemel Hempstead). The Council is planning to deliver a fair share of this sub-regional growth. Decisions over growth have been driven by the Council's own findings and a localist approach as set out in the Place Strategies.

6.6.2 Due to the geography of the Borough, some housing demand has been met at the edges of its boundaries in adjoining authorities in the past. This is not unusual given the closeness of some settlements to its boundaries, and the constraints of the Green Belt and high landscape quality.

6.6.3 The Statement of Compliance with the Duty to Co-operate (Examination Document SUB8) explains the relationship of the Council with its neighbouring authorities. It sets out how the Council has worked constructively and collaboratively with such authorities (and other organisations) on a variety of planning matters. Joint working on topics within the evidence base is a clear example of this e.g. the SHMA and the SHLAA (respectively Examination Documents HG7 and HG12). In general, there have been on-going discussions on cross-boundary local and strategic housing issues. Adjoining authorities have accepted Dacorum's level of housing growth. They have not argued for it to accommodate any of their housing demand.

6.6.4 The Council has circulated the Statement to those authorities and organisations referred to within it, with a request for feedback should it contain anything of concern. No comments had been received by the deadline given.

6.6.5 There has been substantial house building on the Three Rivers part of Kings Langley. This has by default helped accommodate some of the village's housing demand and needs outside of the Borough boundary. However, this has had implications on the village itself (such as on primary schooling) that needs to be carefully managed through on-going co-operation with the County Council. (See Issue 13).

6.6.6 The Council has asked Aylesbury Vale to consider the potential to accommodate a small amount of growth stemming from the Tring Rural area, in recognition of the role Aylesbury plays as the main service centre for communities in this part of Dacorum. This request has been acknowledged by Aylesbury Vale Council, but it is as yet unclear whether it will be taken into account within their emerging Local Plan.

6.6.7 There have been on-going discussions with St Albans over the growth of Hemel Hempstead, the role of the Maylands Business Park and the potential extension of the town eastwards, particularly around work on the East Hemel Hempstead Area Action Plan (Examination Documents AA1 and AA4). Much of this focussed on the (then) major growth scenario at Hemel Hempstead signalled by the regional spatial strategy (and since quashed). St Albans intends to retain the area in the Green Belt which is a position the Council has accepted. This implies it is not necessary to provide safeguarded land. See response to Issue 10: question 10.2 and Issue 2: question 2.5 regarding safeguarded land.

**6.7 Proposed minor change MC26 refers to a shortfall of 15% being used as a trigger for action by the Council. What is the justification for the 15% figure?**

6.7.1 The Council considers Policy CS17: New Housing in the Pre-Submission Core Strategy (Examination Document SUB1) sets out a reasonable approach to assessing delivery of the housing supply, albeit it acknowledges that it is not one widely used by other authorities in Hertfordshire or elsewhere. The methodology should be supported.

6.7.2 The policy offers a practical approach and a clear statement of intention of the Council to be more rigorous in its assessment of delivery and to take action to maintain a sufficient housing supply (see also MC26 in the Report of Representations: Examination Document SUB5 for a clarification of the actions). The approach provides a practical measure against which to highlight underperformance of the housing trajectory. It also provides the authority with a quantitative (and more transparent) approach against which the Council can bring forward local allocations, if circumstances justify.

6.7.3 The Council considers the 15% figure in Policy CS17: New Housing represents an appropriate trigger point that is focussed at the higher end of delivery, establishes a reasonably early trigger point to signal concerns over under-supply (i.e. at 85%), but allows for a degree of leeway below what should be achieved (as it is unlikely that there will be a perfect match year-on-year in supply when measured against the housing trajectory). Progress on delivery will still need to be seen in the light of the monitoring of the 5-year supply.

6.7.4 The Council does accept that the policy would benefit from a minor rewording to explain that intervention would be required where actual and projected housing completions fall 15% below the housing trajectory (rather than to 15% as could be originally interpreted). This is put forward as a further minor change to Policy CS17: New Housing.

6.7.5 However, if the Inspector considers that a more traditional approach, emphasising the maintenance of a 5-year deliverable housing land supply, to be preferable, the Council is willing to amend the policy to this effect.

## **6.8 Should the Core Strategy establish the Council's overall approach to housing densities, as suggested in paragraph 47 of the NPPF?**

6.8.1 The issue of housing densities is also considered in the light of the Council's responses to Inspector's Issue 4: Design and Using Resources Efficiently (questions 4.1-4.3).

6.8.2 Paragraph 47 of the National Planning Policy Framework (Examination Document REG 15) suggests local planning authorities should set out their own approach to housing density to reflect local circumstances. However, while the Core Strategy is keen to deliver appropriate levels of development this must not be at the expense of the character of settlements, neighbourhoods and streets. Furthermore, density should not be considered in isolation from other aspects of design that seeks to deliver a high quality of development and that contribute to a sense of place.

6.8.3 The Pre-Submission Core Strategy (Examination Document SUB 1) is intended to provide a starting point for establishing a local approach to housing density. Urban design, and the issue of built density, is dealt with in detail in section 10 of the Pre-Submission Core Strategy. Policies CS4: The Towns and Large Villages and CS10: Quality of Settlement Design support a high density of development in town and local centres, while Policy CS1: Quality of Neighbourhood Design

encourages proposals that respect the typical density intended in an area. The approach has been underpinned by technical work in the Urban Design Assessments (and update paper) (Examination Document BP5). This document sets out urban design zones and typical density ranges at the settlement level, and is reflected in the Vision Diagrams at the end of each Place Strategy.

6.8.4 The Pre-Submission Core Strategy (Policy CS11) is committed to the production of an Urban Design SPD, and this will supplement the broad approach set out in the plan. This offers the most appropriate opportunity to provide a local expression of housing densities sought through the NPPF. The SPD will be in the form of a detailed and over-arching strategy. It will bring together existing policy documents and on-going technical work on design including the Residential Character Area and Conservation Area Appraisals (Examination Document OT 1) and the Urban Design Assessments. If necessary, this can be supported by a specific policy in the Development Management DPD (as indicated in the Local Development Scheme: Examination Document OT3).

6.8.5 The Council would also emphasise that housing densities can be effectively considered on an individual site basis through the Site Allocations DPD.

## **6.9 How will the housing needs of villages in rural areas be met?**

6.9.1 The Pre-Submission Core Strategy (Examination Document SUB 1) assumes that general housing demands arising over the lifetime of the plan will in part be met by neighbouring towns and larger villages. However, the Countryside Place Strategy (section 26 of the Core Strategy) does anticipate around 420 new homes will come forward in the countryside. This includes sites within the smaller villages.

6.9.2 The Pre-Submission Core Strategy does not see smaller rural villages and the wider countryside contributing greatly to meeting overall housing demand. There will be limited scope for new housing as it is acknowledged to be an area of development restraint (Policy CS1: Distribution of Development and Table 1: Settlement Hierarchy). This reflects existing policy, physical, and environmental constraints. For example, many of the villages are attractive, have strong character and historic cores, covered by important landscape designations such as the Area of Outstanding Natural Beauty, and development opportunities are limited as a consequence.

6.9.3 Most opportunities will be for meeting local needs, principally through reuse and redevelopment. Housing need would generally be directed towards the smaller selected villages in the Green Belt and Rural Areas (Policies CS6: Selected Small Villages in the Green Belt, and CS7: Rural Area). The Council will work with Parish Councils and the new Rural Enabling Officer to bring forward sites. Where possible, suitable opportunities will also be identified through the Site Allocations DPD process.

6.9.4 Both Policies CS6 and CS7 allow for small-scale housing development within the villages. Further opportunities for development could be allowed by virtue of paragraph 89 of the NPPF (Examination Document REG 15) regarding the

redevelopment of previously developed sites. This has been reflected in proposed minor changes to Policy CS5 through MC14 (and also resulting in associated changes to Policy CS7 under MC16).

6.9.5 Policy CS20 would support generally larger housing schemes (i.e. up to 15 units) within and on the edge of rural villages. The general expectation is that these would chiefly be for affordable housing unless an element of market housing was required on viability grounds. The overall approach to rural affordable housing sites is set out in section 12 in the draft Affordable Housing SPD (Examination Document HG 18).

6.9.6 There could also be a smaller (and less predictable role) for larger windfall sites (although when they do come forward they can be locally significant e.g. the former Egg Packing Station at Gubblecote (near Wilstone) has planning permission for 26 homes (application 4/1352/11). In theory, schemes under a Community Right to Build Order or supported through Neighbourhood Plans could contribute towards housing in rural villages. At this point in time none have been put forward and it is difficult to gauge whether there will be genuine local interest in pursuing this particular approach.

6.9.7 Progress on delivering housing sites in the countryside as at 1<sup>st</sup> April 2011 (based on information in the Annual Monitoring Report 2010/11 (Examination Document BP 2) is as follows:

**Table 6.4: Rural Housing Completions 2006-2011**

<b>Completions (2006-2011)</b>	<b>72</b>
Planning permissions	78
SHLAA sites	46
Rural Exceptions	105
Windfalls	106
<b>Total</b>	<b>407</b>