

DACORUM CORE STRATEGY EXAMINATION

**STATEMENT BY
VINCENT AND GORBING
ON BEHALF OF
TAYLOR WIMPEY UK LIMITED**

Issue 6 : Meeting Community Needs

This statement has been prepared by planning consultants Vincent and Gorbing on behalf of Taylor Wimpey UK Limited.

Taylor Wimpey ("TW") control land which forms part of the area to the west of Hemel Hempstead that is broadly identified as a Local Allocation in the Core Strategy (LA3). TW have been working with the Council and the other landowners in order to bring forward the allocation, demonstrating its environmental acceptability and its deliverability.

Inspector's Issues and Questions

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 the SS and LA policies clear? There are no local allocations or strategic sites included in 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?

In general terms, TW consider that the housing policies of the Core Strategy meet the objectives of the NPPF to deliver a wide choice of quality homes.

TW have raised no objection to the differentiation between Strategic Sites and Local Allocations although it might assist if there was some clarification within the Core Strategy regarding the differences between them. It is our understanding that the Local Allocations are defined as locations where development will occur in the future with the timing of release dependent on a number of factors, including the delivery of housing elsewhere and the provision of infrastructure. The timing of release will be defined through the Site Allocations DPD.

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

This is largely a matter for the Council to address. However, TW consider that the Council have taken a reasonable view on the deliverability and timing of development on sites identified in the SHLAA. However, it is difficult to accurately predict the impact of economic and fiscal conditions in the future and this is another reason why the Local Allocations play an important role in meeting housing needs, given uncertainties around contributions from more complex housing development opportunities such as those related to the regeneration of Hemel Hempstead town centre.

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

As we have set out in our representations to Issue 2, in our view, the settlement hierarchy strikes the correct balance between focusing development in the key settlements, and Hemel Hempstead in particular, whilst allowing for demonstrated local needs to be met in smaller settlements

and rural areas. Concentrating growth in Hemel Hempstead has clear sustainability advantages, reducing the need to travel to employment, services and amenities and increased use of previously development land. The growth in key settlements will help to support the needs in the towns and maintain the communities within these settlements. This balanced approach is supported by the SA.

The actual number of dwellings indicated in Table 8 appears appropriate given the overall spatial strategy. It is important to note that the text indicates that this provides a 'yardstick' against which to judge the delivery of new housing and its distribution, rather than being a firm distribution between settlements.

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?

TW do not challenge the overall housing target of 10,750, based upon the comment in paragraph 14.9 of the Core Strategy that this is the level of housing which the Council "*expects to achieve and exceed.*" However, in this context, Policy CS17 itself could be helpfully clarified to reflect this objective.

At present the text merely states that “an average of 430 net additional dwellings will be provided each year (between 2006 and 2031).” It would provide greater certainty to add as follows : “...*in order to achieve or exceed a total provision of 10,750 new homes within the plan period.*”

We have always had some concerns that the deliverability of some of the more complex sites in the trajectory – such as Hemel Hempstead Town Centre - may frustrate the overall delivery of housing during the Core Strategy period. However, the management of the LAs will be important to ensure that any delays do not result in unmet housing needs. In addition, the Council has rightly not made any allowance for windfalls in the first 10 years of the plan. Given these two factors, we are satisfied that there is sufficient flexibility within the Core Strategy to meet housing needs and the Council’s approach is therefore sound.

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

Again, this is largely a matter for the Council and TW do not challenge the overall housing requirements. We consider that the housing evidence base is robust and sufficiently accurate insofar as a sound *minimum* housing figure is concerned.

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

TW raise no objection to the shortfall of 15% as a trigger for action. That said, our experience with other authorities is that a figure of 10% is more common and has been accepted in Core Strategies elsewhere. A reduction in the trigger point would reflect the increased emphasis in the NPPF in maintain the supply of housing. The issue is not one of ‘soundness’ so much

as ensuring the necessary flexibility within the Core Strategy to meet housing needs.

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

Such is the variety of areas and sites within the Borough that specifying densities for particular types of sites would almost certainly be counter-productive. Policy CS18 highlights the need for a mix of housing to provide choice, with the appropriate mix being guided by a variety of matters including site specific considerations. From the developers' perspective, such an approach is more likely to yield appropriately designed developments that make the best use of land, meet overall housing needs, whilst at the same time reflecting the context of each site.