

ISSUE 1 BASIS OF OVERALL STRATEGY

1.1 (a) Does the DPD have regard to national and regional policy and if there are any divergences how are these justified?

- 1.1.1. 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 an integrated approach to economic, social and environmental considerations. As a core planning principle, para. 17 states that *every effort should be made objectively to identify and then meet the housing, business and other development needs of an area and respond positively to wider opportunities for growth.*
- 1.1.2. 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.*
- 1.1.3. Thus there is 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.
- 1.1.4. We are concerned that the Council's proposed housing target is insufficient to meet the future needs of the Borough (discussed elsewhere) as it does not take account of the projected demand for housing as established in its own evidence-base. The Council has not fully taken into account the scale of housing that the local population needs over the Plan period to *meet household and population projections taking into account migration and demographic change*, as required by para. 159 of the NPPF.
- 1.1.5. 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.* We comment on the Sustainability Appraisal under Question 3.
- 1.1.6. In our submission the Council has a duty to identify a strategy that is capable of meeting the full demand in light of government policy. Moreover the judgement that it has made is to a large extent subjective. There is no evidence that would dictate an overriding objection to any additional land release. 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.
- 1.1.7. Moreover we consider that the Council has not taken full regard of guidance in the NPPF on green belt matters. Para. 83 of the NPPF states that *once established, Green Belt boundaries should only*

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

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be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

- 1.1.8. Para. 85 deals with defining green belt boundaries. It stipulates those matters which a Local planning authority should ensure when defining green belt boundaries. These include:
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
 - where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;
- 1.1.9. In its wish to limit green belt releases as a justification for not meeting a housing target based on demand projections, the Council has not taken account of the need for green belt boundaries to endure beyond the Plan period.
- 1.1.10. It is considered both that insufficient land has been identified to meet the long term needs of the Borough during the Plan period, and that by failing to identify any safeguarded land there will be unwarranted pressure for further green belt releases beyond the current Plan. This is contrary to national policy guidance

(b) What are the implications of the forthcoming revocation of Regional Spatial Strategies?

- 1.1.11. It is considered that the forthcoming revocation of the RSS will have limited impact on the Core Strategy. By virtue of the High Court decision to quash the housing and green belt provisions in the East of England Plan as they related to Hemel Hempstead, the Borough has had greater flexibility in establishing its housing requirement, subject to the requirements of the NPPF and the localism agenda.
- 1.1.12. The designation of Hemel Hempstead in the East of England Plan as a *Main Centre for Development and Change* is enshrined in the settlement hierarchy of the Core Strategy and is a proper reflection of the town's status in both the Borough and wider sub-region. This should not change as a result of the revocation of the RSS.

(c) Are there satisfactory linkages with the Decorum Sustainable Community Strategy and other local strategies?

- 1.1.13. No comment

1.2. (a) In general terms is the overall strategy based on a sound assessment of the socio-economic and environmental characteristics of the area and are the impacts of the proposals properly addressed?

- 1.2.1. The Council has argued that its proposed housing targets cannot meet the projected demand for housing because of green belt and environmental constraints. However, as noted above, the Council does not take full account of socio-economic factors in their assessment.

1.2.2. An illustration of the undesirable consequences of this approach can be seen in relation to affordable housing. Affordable housing is a key corporate and planning priority of the Council (para. 3.37 of the Background Paper – Selecting the Core Strategy Housing Target). Yet the response to this hardly supports its evident importance.

1.2.3. Firstly, despite acknowledging that housing needs surveys have shown a high level of need and that the methodology suggests that this may always be the case, the Council are dismissive of the quantum of registered affordable housing need on the grounds that it is demand led:

“The council has not observed the effects of housing need as being unduly serious over recent years, e.g. it has not observed longer-term high levels of homelessness. Numbers shown in the housing register are significant, but exaggerated because it is demand led.”

1.2.4. Secondly, the measures it proposes to adopt to address affordable housing need (see para. 3.37 of the Background Paper) all involve management and structural measures within the existing supply. This fails to recognise that the greatest contribution to additional affordable housing will come from additional market housing developments, an opportunity which is severely compromised by the council’s overriding wish to suppress housing provision below the required level.

1.2.5. A further illustration of the inappropriateness of the Council’s approach is provided by para. 5.2 of the Background Paper. As noted above this acknowledges that recent national household projections are a reasonable yardstick for assessing demand. The paper then proceeds to dismiss these projections by saying that they are *probably inflated*. Not only do the Council fail to provide any evidence to support such a statement, they then go on to state that *the effect of some household formation being postponed would not be serious*.

1.2.6. In other words in relation to both affordable housing and housing overall, the Council appears to have assessed the relevant characteristics but not addressed the implications, preferring to dismiss them to fit a pre-existing stance regarding the scale of land release that this implies. As noted in Section 1.1 above, this in itself is based on an inappropriate interpretation on the consequences of Green Belt release.

1.2.7. In para. 3.25 of the Background Paper the Council states that *it is debatable the extent to which all household formation will materialise given the negative effects of current housing affordability and the recession/employment opportunities on household formation. These factors can lead to a delay in leaving the parental home and transitions to independent living, partnership and family formation*. This consideration ignores the long-term nature of the Core Strategy. Over a plan period extending to 2031 there will inevitably be a number of fluctuations in economic and other influences on housing demand. A consequence of the recent economic downturn will have been to suppress household formation, but experience shows that a significant element of this is temporary. The resultant increase in hidden households will increase housing demand as the economy recovers.

1.2.8. It appears therefore that the Council is using the current economic situation as an excuse to limit housing development in the Borough and as such is acting against the aims of national planning policy and other government initiatives to stimulate economic growth and provide thriving and mixed communities. This approach does not result in the correct balance of social, economic and environmental factors to create sustainable development.

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(b) Would an appropriate balance between providing new homes and safeguarding the quality of life of existing residents be achieved?

- 1.2.9. Our response to this question is largely provided above.
- 1.2.10. The Council consider that its housing targets provide a balance between environmental constraints and housing requirements. The purpose of planning is to balance these often conflicting considerations to ensure sustainable forms of development. But the NPPF requires that this is carried out against a backdrop of the clear requirement to meet development needs in full and to secure growth in the national interest.
- 1.2.11. By under-providing, the Council is failing to address these policy requirements. The consequences will include increased house prices, intensified affordable housing needs, and out migration – all detrimental to the Council's ability to deliver its stated vision and objectives.
- 1.2.12. It is acknowledged that uncontrolled development would have a negative impact on environmental constraints. However, that is not a risk. One of the consequences of a plan-led system, especially where Green Belt boundaries are concerned, is to ensure that development and land release is controlled and that the best relative outcomes are achieved.

1.3. (a) Is the DPD based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances?

- 1.3.1. It is acknowledged that the Council has conducted sustainability appraisals of the Plan and has tested alternatives. However, even though there is recognition of the interdependence of housing and other issues the current strategy as proposed by the Council will not facilitate economic growth, investment in regeneration or result in overall balanced and mixed communities.
- 1.3.2. We do not object to the methodology used in the sustainability appraisals but we do believe that the conclusions drawn in some instances are flawed. The SA report is far too coarse grained to substantiate a claim that any particular increase in housing provision would be unacceptable in principle.
- 1.3.3. This is clearly illustrated by reference to the analysis of alternative housing targets 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.”*
- 1.3.4. 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.

1.3.5. Indeed, when one turns to the analysis of individual sites it is clear that the analysis as regards Shendish (combined proposal)² does not accurately reflect site circumstances in any event. We have assumed it is appropriate to address these concerns in response to Issues 2 and 10. If relevant to Issue 1 however, we rely on the material contained in the statements for those sessions.

1.3.6. We do however 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.

(b) Is there too much reliance on the preparation of 'subsequent plans' and are such plans identified in the Local Development Scheme?

1.3.7. No comment

1.4. Will the Strategic Objectives (page 37) satisfactorily address the identified challenges (page 29)?

1.4.1. It is considered that the strategic objectives should in principle address the identified challenges as stated on page 29. However, as stated throughout our representations we believe that the Council's proposed strategy will not adequately address the challenges of achieving sustainable growth because they have not adequately or correctly balanced the social, economic and environmental factors which needs to underpin its achievability.

1.5. Is the relationship between the Core Strategy, the Dacorum Borough Local Plan (1991-2011) and the Proposals Map sufficiently clear?

1.5.1. No comment at this stage.

Principal Changes Requested

- **Increase in housing target to 13,500 in accordance with 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 location for 900 dwellings in accordance with the principles of the proposals put forward by W Lamb Ltd**

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

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