

## ISSUE 2 THE DISTRIBUTION OF DEVELOPMENT (SETTLEMENT HIERARCHY) AND THE GREEN BELT

### 2.1. What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the sustainability appraisal support the chosen hierarchy?

2.1.1. No comment.

### 2.2. Is the site selection process based on appropriate criteria

2.2.1. We do not challenge the criteria that have been used in the site selection process but we do challenge some of the conclusions. There are two specific components to this criticism (already referred to in our statement on Issue 1). Firstly, we draw the Inspector's attention to the comparative evaluation of Shendish and West Hemel Hempstead set out in section 5.4 and Appendix 4 of our main response to the Pre Submission Draft Core Strategy.

2.2.2. Secondly, and reflecting the Development Framework Document submitted with our response to the Pre Submission Core Strategy, we consider that there are a number of inaccuracies in the Council's evaluation of Shendish (combined proposal)<sup>1</sup>. For instance:

- Distance to a local shop is stated to be 2172m. The centre of the site is 780m (crow flies) and 1540m (road) from Sainsbury's supermarket and other retail outlets in London Road;
- Distance to a station is stated to be 1390m. It is 500m from Apsley Station;
- Distance to a primary school is stated to be 1911m. It is 560m from Two Waters Primary School;
- It is stated that Rucklers Lane and its junction with London Road are *unlikely* to have the capacity to cope with the extra traffic resulting from the proposal put forward by W Lamb. This appears to dismiss (without countervailing evidence) the detailed assessment carried out by WSP (see section 4.3 of Appendix 2 of the Development Framework document);
- It is stated that development would *breach a strong Green Belt boundary to the south of the town provided by the railway line*. This ignores the fact that the site adjoins a significant area of built development already excluded from the Green Belt on the south side of the railway line – ie the Manor Estate and the extension to it (and release from the Green Belt) now under construction;
- It is stated that development would erode the gap between Hemel Hempstead and Kings Langley. It would not;
- It is stated that development would set a precedent for further development to the south of the railway line. It would not. The strategy deals comprehensively with this self-contained area of land. In any event, the permanence required of Green Belt boundaries once set would preclude any further release, and certainly unless exceptional circumstances could be demonstrated through a subsequent review of the Plan;
- It is stated that development here would not support the vision of creating cohesive communities in the town's neighbourhoods. A specific opportunity exists at Shendish to reinforce the neighbourhood concept by integrating existing developments to the south of the

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<sup>1</sup> Assessment of Local Allocations and Strategic sites, June 2012 pp 62 - 66

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railway at the Manor Estate and Rucklers Lane which currently do not conform to the neighbourhood concept.

- 2.2.3. Additionally on this matter we note the conclusion on deliverability (page 64 of the Council's assessment) that the main barrier to development is finding an access solution that meets the approval of the Highway Authority and the installation of a new/improved railway bridge. The Inspector is asked to note that as a result of discussions with Network Rail and the Highway authority it has been established that neither party has an objection in principle to this. Specifically, Network Rail is content provided the Highway Authority will adopt the bridge and the road (it is not currently adopted); the Highway Authority has indicated that they would be willing to adopt the access road and, in principle, the bridge over the railway, provided the bridge is upgraded to current design standards which may mean its replacement. For the purposes of establishing the principle of release at this stage in the process, access is therefore not a barrier to development.
- 2.2.4. Finally, we draw the Inspector's attention to the Sustainability Appraisal of the Shendish location (as promoted by W Lamb) which is contained at Appendix 3 to our main response statement to the Pre Submission Core Strategy. The intention has been to provide the Inspector with a detailed evidence base, subjected to SA, allowing the opportunity for the allocation of this site to be recommended as a Main Modification to the Core Strategy.

### **2.3. (a) What is the justification for holding local allocations in reserve?**

- 2.3.1. There is no justification for holding Local Allocations in reserve. The sites are evidently needed to meet the housing requirement, and indeed in our submission additional sites such as Shendish are also required.
- 2.3.2. Large sites often require a considerable lead-in time. Given the evident dependence of the strategy on them this is all the more reason why a firm commitment should be made at this stage. Developers require certainty to invest, especially in the current market characterised by economic weakness, and this is plainly undermined in the absence of a clear commitment to the release of sites in the statutory development plan.
- 2.3.3. Indeed, the development plan system has not historically shown itself to be efficient in responding to the short-term need to stimulate the release of additional sites, especially where the opportunities are restricted by factors such as Green Belt as is the case in Dacorum.
- 2.3.4. The Council's proposals to encourage sites to come forward if the level of completions falls below 15% in the housing trajectory is impractical even with the suggested change M26. It is unlikely that the Council will be able to react quickly enough to implement sufficient measures to bring forward sites from later phases of the Plan to meet such a shortfall. We believe that such a trigger and the phased release of sites is inappropriate having regard to the housing policies of the NPPF and the specific measures set out in para. 47.

### **(b) What will be the process for bringing forward their release and is it set out in sufficient clarity?**

- 2.3.5. This is a matter for the Council but significantly there is no mechanism set out in the Core Strategy as to how the Council will bring sites forward, and thus, more importantly, no way of establishing with the required certainty that the Council would be able to implement positive measures to bring sites forward in a timely manner.

**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?**

2.4.1. As a matter of principle it is considered that the exceptional circumstances required in accordance with para. 83 of the NPPF do exist to justify changes in the green belt boundaries to meet housing needs over the plan period and beyond.

2.4.2. The status of Hemel Hempstead in the settlement hierarchy dictates that it should be the focus for the majority of new development. Whilst recognising the need to optimise the use of urban capacity (subject to deliverability testing), the tightly defined green belt boundary means that further land release can only be achieved through the targeted removal of land from the green belt.

**2.5. (a) Paragraph 83 of the NPPF refers to the permanence of the green belt in the long-term so that 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?**

2.5.1. The Council has taken no steps to identify safeguarded land adopting the mechanism provided in para. 85 of the NPPF. This is a serious flaw in the strategy, especially if – contrary to our representations – the housing provision of the Plan remains manifestly below identified housing needs.

2.5.2. One of the long-standing intentions of the government in green belt policy (carried forward in to the NPPF from PPG2) is that in reviewing boundaries local authorities should ensure that they will endure so as not to undermine the intended permanence of the green belt. Green belt boundaries were reviewed in the last Local Plan and land released to meet housing requirements. Whilst it is acknowledged that the necessary exceptional circumstances exist again in this review to make releases, every effort should therefore be made to avoid the need for a further green belt review when the Core Strategy is reviewed.

**(b) 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?**

2.5.3. No comment.

**(c) Can the Council be confident that the green belt boundary will not have to be altered at the end of the plan period?**

2.5.4. This is a question that only the Council can answer. However, based on our representations that the Plan does not provide an adequate housing target to meet the demand for housing in the current Plan period, it is highly likely that the green belt boundaries would have to be amended at the end of the plan period. As stated above that would in our submission be contrary to the intention of government policy.

**2.6. How and when will settlement boundaries be reviewed?**

2.6.1. No comment.

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**2.7. Should limited infilling in selected small villages in the green belt be restricted to only affordable housing for local people? Paragraph 54 of the NPPF suggests that consideration be given to allowing some market housing to facilitate the provision of significant additional affordable housing. Should this approach be more clearly reflected in the Core Strategy?**

2.7.1. No comment.

**Requested Changes**

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