

## **Dacorum Borough Council Core Strategy**

### **Independent Examination**

#### **Issue 6 Providing Homes**

##### **Banner Homes Representor ID 211062**

This written submission to the Examination is made on behalf of Banner Homes who are promoting the development of land at New Road, Northchurch for housing development. It covers those Questions or parts of Questions which are of particular relevance to the original submissions made to the pre-submission draft Core Strategy.

#### **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?**

Paragraph 14 of the National Planning Policy Framework advises local planning authorities to positively seek opportunities to meet the development needs of their area. In paragraph 47 it advises local authorities of ways in which they should boost significantly the supply of housing. Dacorum Borough Council has not taken sufficient account of the need for a higher target for housing provision overall, particularly bearing in mind this guidance. Also the Council has not provided sufficient flexibility in its policies to adapt to rapid change which forms part of the advice to local authorities in paragraph 14.

The housing policies in the Core Strategy do not make clear how the Strategic Sites and Local Allocations will operate to ensure the delivery of the annual target of 430 units. For example, Policies CS2 and CS3 do not adequately specify the status of the sites which are only identified in the Place Strategies' chapters. In any event, there should be a greater number of sites potentially available as Local Allocations to enable the Core Strategy and the subsequent Site Allocations development plan document to have sufficient flexibility to deliver the housing numbers required.

Also, it is confusing to have a total housing target of 10,750 which is the grand total of the policy commitment in policy CS17 and then a higher figure in Table 8 of 11,320. It is not clear why this higher figure is not reflected fully in the policy itself.

It is considered that it is appropriate to identify the key housing sites on which the delivery of the Core Strategy depends. Given the restricted nature of the number of sites identified, particularly in Berkhamsted,, it is important that the status of these sites is more explicit.

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

The key issue with the SHLAA is not necessarily the information that is recorded but the conclusions that have been drawn from the information that is contained in it. The current economic circumstances are affecting potential delivery and viability is a key issue. Assumptions made about delivery need to be kept under regular review. In these circumstances there is a good case to be made for a broad portfolio of possible sites to maximize the chances of the delivery being realised.

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

No, there is no specific justification for the apportionment between settlements in the Core Strategy. It is clear from Chapter 8, the Sustainable Development Strategy chapter, that the majority of development is proposed to be delivered in Hemel Hempstead. However, there is no specific justification for 'The Distribution of Development' and Settlement Hierarchy in Table 1, see Appendix 1. Also, Policy CS1 Distribution Of Development sets out general principles without any specific evidence.

As far as Berkhamsted is concerned there is a significant difference between the apportionment set out in Table 8 in the Core Strategy and the distribution of housing completions set out in Table 3.4 in paragraph 3.34 of the Council's Housing Land Availability Paper (July 2011). The figure for Berkhamsted in Table 3.4 which measures the distribution of housing completions by settlement for the period 1<sup>st</sup> April 2001 to 31 March 2010 shows 18.4% of the Borough's total was in Berkhamsted and Northchurch. The comment is made that these figures will provide a yardstick to inform future distribution. This compares with just 10.4% in the distribution proposed in the Core Strategy in Table 8. There is no explanation for this substantial difference.

It is also clear from Residential Land Commitments Position Statement No 39 that the projected commitments for Berkhamsted and Northchurch are very low, at less than 10% of the Borough total. This is a consequence of a decision to restrict the further growth of Berkhamsted which is without any justification.

**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?**

No, it is considered that both the figure of 10,750 in policy CS17 and 11,320 in Table 8 are insufficient to adequately meet the needs for housing in the Borough. We refer to submissions made to the Council in the past by others including Barton Willmore on behalf of Cala Homes which was referenced in representations made on behalf of Banner Homes. As a minimum this toolkit appraisal recommended a target of 12,084 for the plan period.

The Housing Needs and Market Assessment Update 2012 prepared by David Couttie Associates identifies a significant need for affordable housing of around 730 units a year, based on meeting a historic backlog. There is therefore a substantial shortfall in anticipated delivery of housing when compared to an overall annual housing target of just 417 units per year in the draft Core Strategy.

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

The Housing Land Availability paper (July 2011) identifies 853 units coming forward in Berkhamsted in defined sites during the period 2006-2031. On further examination of these figures and the sites they represent it is clear that much of this development has already occurred. There is an ever decreasing potential source of supply within the existing built up area which will affect the supply of housing land in Berkhamsted / Northchurch in the rest of the plan period.

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

No specific comment is made on this issue.

**d) What assessment of previously developed land has been undertaken?**

No specific comment is made on this issue.

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

The policies do not appear to have sufficient flexibility to deal with changing circumstances. The limited site allocations proposed for Berkhamsted, i.e. SS1 and LA4, in addition to a restricted housing number allocation, do not allow for any flexibility to respond to changing circumstances without a local plan review. This is a result of the failure to identify sufficient potential sites currently in the Green Belt which could be brought forward in changed circumstances. This is contrary to national guidance on the Green Belt set out in paragraph 83 which advises local

authorities to set boundaries having regard to their intended permanence beyond the plan period. Given the restricted nature of land supply in Berkhamsted and Northchurch within the current settlement boundary, as evidenced in the review of SHLAA sites I have carried out in the table attached to this representation, see Appendix 1.

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

No specific comment is made on this issue.

**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?**

No specific comment is made on this issue.

**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?**

No specific comment is made on this issue.

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

No specific comment is made on this issue.

**What part of the Core Strategy is unsound**

The housing target in Policy CS17 and the strategy for the delivery of the housing target in policies CS2 and CS3 are unsound.

Policy CS1 is also unsound.

**Which soundness criterion it fails**

Policies CS2, CS3 and CS17 fail the 'effective' soundness criterion.

Policy CS1 fails the 'justified' criterion.

**Why it fails**

Policies CS17 fails because it will not deliver sufficient housing to meet the borough's needs as the target is insufficient. This is discussed above and set out in Banner Homes' original representations on the Pre-Submission Core Strategy.

Policies CS2 and 3 are not effective as they will not deliver sufficient supply of housing to meet the target.

Policy CS1 is not justified as there is insufficient evidence to the relative apportionment of the housing distribution between settlements, particularly in Berkhamsted.

**How the Core Strategy can be made sound**

Policy CS17 should have a higher housing target of at least 12,084, i.e. 483 per annum.

Policies CS2 and CS3 should make clear the status of the Strategic Sites and the Local Allocations. It would also be helpful if they were named and referenced here within the policy. There should be a greater number of these sites, particularly in Berkhamsted.

Table 8 should be amended to identify more development for Berkhamsted, at least in line with an enhance borough wide total.

**The precise change and or wording that you are seeking**

The annual housing target in policy CS17 should be increased to 483 with the total for Berkhamsted being increased accordingly in Table 8.

Additional sites identified as a Local Allocation for Berkhamsted, particularly the Banner Homes site in New Road. Local Allocations should be specifically referred to in policy CS3.

**Appendix 1 to Banner Homes' Submissions Issues 2, 6 and 11**

**Review of Sites in Berkhamsted / Northchurch Identified as 'Acceptable' for Development SHLAA 2008**

Site Name	Ref No.	Unit Nos. (SHLAA)	Green Belt	LDF Assessment 2012	Pre-Submission Draft Site	Comments	Potential Future Supply 2012
Alma Road / Duncombe Road Northchurch	N1	8	No	No	No	Planning permission for 4 cottages	4
Land at Egerton Rothesay School, Durrants Lane Northchurch	N13 (N10)			Officer's recommendation that there are no significant environmental impacts to reject it as a housing site.		Part existing Local Plan Housing allocation H37 Net capacity 100 units Proposed strategic site allocation for Berkhamsted SS1- 180 units	180
Land west of Durrants Lane, Berkhamsted	N15	177	Yes	No	No		
Land west of New Road Northchurch	N16	83	Yes	Considered favourably as second choice site after LA4. Some doubts raised by officers about further consideration.	No	Site was considered in the Emerging Core Strategy consultation, June 2009. Estimated potential 50 units.	
Stag Lane/High Street Berkhamsted	BW3	27	No	No	No	Housing Land Availability Paper App 4 and App5 14 units.	14
Park Street Berkhamsted	BW7	8	No	No	No	App 5 Land Availability Paper Impact on large grounds surrounding church. No developer intentions	
Majestic Wine Warehouse High Street Berkhamsted	BW16	20	No	No	No	App 5 Land Availability Paper Still in viable use Loss of employment	

Site Name	Ref No.	Unit Nos. (SHLAA)	Green Belt	LDF Assessment 2012	Pre-Submission Draft Site	Comments	Potential Future Supply 2012
British Film Institute (BFI) Kingshill Way Berkhamsted	BW24	136	Yes	No	No	10 units have been allocated to this site in Appendix 4 of Housing Land Availability Paper (July 2011)	10
Hanburys, Shootersway, Berkhamsted	BW25	70	Yes	Officer recommendation – further consideration.	LA4	Option considered in Emerging Core Strategy consultation June 2009. Promoted by landowners. Proposed Local Allocation Site LA4 60 units	60
Land off Shootersway, Berkhamsted	BW26	198	Yes	Part of land south of Berkhamsted. Officer recommendation to give no further consideration.	No		
The Old Orchard, Shootersway, Berkhamsted	BW29	8	Yes	No	No		
Land to east of BFI Kingshill Way, Berkhamsted	BW30	159	Yes	No	No		
Open land off Shootersway (next to Blegberry Gardens), Berkhamsted	BW33	154	Yes	Officer recommendation to give no further consideration	No	Option considered in Emerging Core Strategy consultation June 2009 but not taken forward	
Hospice of St Francis and Blue Mist , Berkhamsted	BW34	16	No	No		Now built	
Chilterns, Stoney Close, Berkhamsted	BW35	12	No	No	No	Under construction	
Clarence Road, Berkhamsted	BE7	16	No	No	No	Potential site for development. DBC owned App 5 Land Availability Paper	16
Chesham Road, Berkhamsted	BE12	4	No	No	No	Potential loss of sports use	4
Off High Street, Berkhamsted	BE15	7	No	No	No	Active garage, poor access	7

Site Name	Ref No.	Unit Nos. (SHLAA)	Green Belt	LDF Assessment 2012	Pre-Submission Draft Site	Comments	Potential Future Supply 2012
Egerton School Charles Street , Berkhamsted	BE16	5	No	No	No	Conversion to housing implemented App 5 Land Availability Paper	
Ashlyns School and Thomas Coram School, Berkhamsted	BE27	65	Yes	Concluded site should be retained for education.	No	Option considered in Emerging Core Strategy consultation 2009 Loss of school land?	
1 Park View Road Berkhamsted	BE28	5	No	No	No	Planning permission granted 755/06	5
Bank Mill Lane, Berkhamsted	BC1	1	No	No	No	Likelihood doubtful?? Part open space/open land	
New Lodge Farm and outbuildings, Berkhamsted	BC2	85	Part Green Belt	No	No	Local Plan Housing Allocation H36 Net capacity 50 units 54 units granted on appeal App 5 - Housing Land Availability Paper	54
Chapel Street, Berkhamsted	BC12	7	No	No	No	Scout Hut close to town centre Potential loss of community use App 5 – Housing Land Availability Paper	7
Greene Field Road, Berkhamsted	BC20	1	No	No	No	In current use	1
St Katherine's Way, Berkhamsted	BC30	6	No	No	No	Green Space on housing estate App 5 Land Availability Paper	6
Rose Cottage, Bank Mill, Berkhamsted	BC38	24	No	No	No	Completed	
High Street /Water Lane, Berkhamsted	BC 41	49	No	No	No	Subject to feasibility and concept statement Existing retail uses Multiple ownerships may affect delivery App 5 Land Availability Paper	49
Manor Street, Berkhamsted	BC42	20	No	No	No	Completed	

Site Name	Ref No.	Unit Nos. (SHLAA)	Green Belt	LDF Assessment 2012	Pre-Submission Draft Site	Comments	Potential Future Supply 2012
Site off Bank Mill Lane, Berkhamsted	BC43	100	Yes	No	No		
110 High Street, Berkhamsted	BC44	12	No	No	No	Housing Commitment Plan Ref:622/05 Plannning permission for 13 units. 12 is net figure	
Land At Tunnel Fields, Berkhamsted	BC45	16	No	No	No	Completed	
<b>Potential Total Future Supply 2012</b>							<b>417</b>



**Additional Sites Considered in June 2012 Final Assessment not referred to above\***

<b>Site Name</b>	<b>Ref No.</b>	<b>Unit Nos.</b>	<b>Green Belt</b>	<b>LDF Assessment 2012</b>	<b>Pre-Submission Draft Site</b>	<b>Comments</b>
Land south of Berkhamsted			Yes	Yes	No	Option not included in Emerging Core Strategy consultation but being actively promoted. Includes 7 parcels of land including BE25, BE 24 and BE26
Haslam Field , Shootersway			Yes	Yes	No	Site put forward for consideration as part of Pre-Submission Core Strategy consultation Loss of playing fields/open space
Home Farm, Pea Lane			Yes	Yes	No	Site put forward for consideration as part of Pre-Submission Core Strategy consultation Rejected as in Chilterns AONB
Ivy House Lane	BC14		Yes	Yes	No	Site put forward for consideration as part of Pre-Submission Core Strategy consultation Rejected due to proximity to Chilterns AONB