

**Submission to Planning Inspector by West Hemel
Action Group [WHAG]**

**Examination of the Dacorum Site Allocations
Development Plan document – October 2016**

Dacorum Site Allocations DPD

Matters, Issues and Questions

Matter 4 - Housing

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1. Is the overall amount of housing provision and its distribution in the Plan consistent with the CS? How has the actual number of dwellings allocated been arrived at? Why the buffer? Should it be greater as suggested by some representors?
2. Specifically, should more housing be allocated and if so would this be possible prior to the completion of the Green Belt review?
3. In the light of Government's stated objective in paragraph 47 of the National Planning Policy Framework of boosting significantly the supply of housing, should the Council be seeking to constrain the release of the Local Allocations? If so, what is the rationale for this?
4. Is it assumed that all sites, both commitments and allocations, will be developed during the Plan period? Are all of these sites likely to be developed? What account is taken of windfalls? What rate of windfall development is anticipated over the Plan period?
5. I have looked at the housing trajectory in the CS and the most recent Annual Monitoring Report (AMR). The level of housing completions in the AMR technical appendix (table 7.1) appears to be lower than those projected in the housing trajectory in the CS, produced a few years ago. Is there an explanation for this? Are there any signs of improvement? Is the early partial review taking account of this ongoing shortfall? Does the Council have a strategy for remedying this? Is the housing trajectory in the Plan realistic?
6. Where are the existing housing commitments? What form do they take – large or small site? Is their distribution in accordance with the CS?
7. If sites are deleted from the Plan it seems likely that others will have to be found? If so, is the Council putting forward any additional sites?
8. What is the current position with regard to housing supply? Is there a 5 year supply? Is there a 5% buffer? Is there any justification for a 20% buffer?
9. What are the main findings of the Viability Study? Has this work indicated that any sites or uses are likely to be unviable? What are the implications? Is more work necessary?
10. How have site densities been determined? How rigid are these figures?

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11. At what stage is an allocation considered to be implemented? Given this should any of the site allocations be taken out of the Plan?
12. What is the threshold for the inclusion of sites and why?
13. What are the targets for the provision of affordable housing? What has been achieved in recent years?
14. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

No comments on the above by WHAG

15. **Are the allocations based on a robust assessment of infrastructure requirements and their deliverability, including expected sources of funding?**

See comments on infrastructure in Matters 9, which are repeated below for convenience.

- 2 **Should the policy reflect the developer of the site will only be required to carry out upgrading of the drainage infrastructure directly related to the site?**

- 1 WHAG consider that any potential developer should be required to do more than just upgrading of site specific drainage infrastructure.
- 2 The existing site already suffers from poor drainage as demonstrated by regular flooding on the existing land and surrounding areas (see picture and link to video below of recent flooding in lower end of LA3 and adjacent Winkwell area).

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Figure 1 View of field in SE corner of LA3, looking west – March 2016

Link to Video on WHAG facebook page, showing flooding along Chaulden Lane – March 2016:

<https://www.facebook.com/316081781856132/videos/768375386626767/>

- 3 The proposed addition of 900 properties to LA3 will inevitably add strain to the existing drainage infrastructure in an area that is already prone to flooding. With additional development on LA3 the water that currently does drain through the land, would no longer be able to do so as a result of hard landscaping.
- 4 The above applies to rainwater drainage but the same principles apply to all forms of drainage, where historically there have been a number of problems.
- 5 As a result, there will need to be significant upgrades to the existing surrounding drainage infrastructure (rainwater and sewage) to accommodate these additional drainage demands, as well as the site specific drainage.

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3 Has full consideration been given to the increase in traffic associated with the development and the pressure on existing schools and healthcare facilities?

- 1 We do not believe the allocations, and specifically LA3, are based on a robust assessment of infrastructure requirements for the reasons below, covering the following areas:
- Transport and roads
 - Health, hospitals and emergency services
 - Education

Transport and roads:

- 2 DBC commissioned a Transport Study in July 2015 by the consultants, Jacobs (*Hemel Hempstead transport model update – 2031 scenario testing - Ref. ver 4 dated 10th July 2015*). This stated that ... “in full traffic demand conditions in the AM period traffic levels [in their model] grow relatively quickly to form queues at key locations... congestion builds from 08.00 to 08.15. Following this point the network reaches gridlock... In the PM period, traffic levels increase more gradually than in the am period... at 16.30 queues have started to form but... still running smoothly... [Once the model] reached 17.00... the queues have become much more severe. Following this point the network reaches gridlock... *The current road network would be unable to cope with the full level of proposed development.*” [Italics – WHAG]
- 3 The Core Strategy 'resolves' this gridlock by assuming an arbitrary 15% reduction in traffic flows without demonstrating
- (1) that the underlying model data is sound;
(2) how this 15% reduction in traffic is achieved; or
(3) what the probability and impact is of the risk that gridlock will occur under this assumption.
- 4 LA3 is a large swathe of land on the western boundary of Hemel Hempstead. The location of the site means that the vast majority of traffic, which we estimate could be in the region of 1500-2000 vehicle journeys per day, will be heading from west to east towards central Hemel Hempstead, on roads which are already nearing capacity. The only planned access points are to the eastern boundary of the LA3 site as it is not practical to build any to the North, South or West. This is illustrated in the diagram below.

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- 5 Though the desire to promote non-car modes of transport is laudable the reality of the location and realistic public transport support are such that the new estate will be largely dependent on private car access to facilities of the town and more widely for travel to work and social activities. The context does not properly reflect the likely impact of the additional car use from the estate.

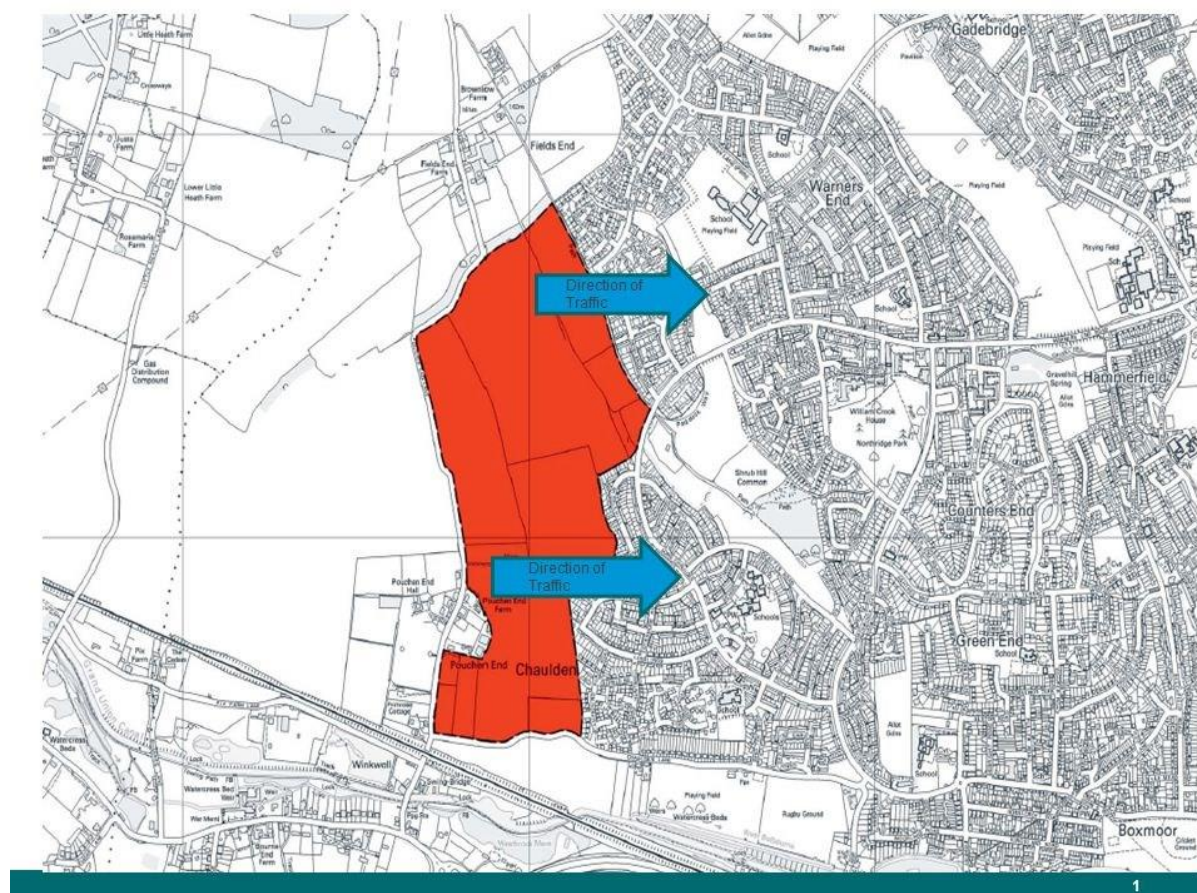


Figure 2 Map showing direction of travel of the majority of traffic from LA3

- 6 Local arterial roads A41 and A4251 and other key local routes are already clogged, resulting in stationary traffic in rush hours. The larger natural traffic flows are towards M25/London via A41/A4251 or eastwards to Maylands Industrial area, this being the largest area for employment in Hemel Hempstead. The incremental and cumulative impact of the proposed development is severe and no effective mitigation proposals have been published.

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- 7 Emergency services would be unable to penetrate as far as LA3 or indeed much of Hemel Hempstead during either morning or evening rush hours, based on the above Jacobs report.
- 8 In addition, the proposed LA3 development, and specifically the current proposed location of the travellers' site down Chaulden Lane (along the southern boundary of LA3), would result in this already busy and dangerous road, used as a "rat run" to the A41 and from there to the M25, becoming busier and more dangerous. This road, in places, is single lane with passing places outside the 30 mph zone, while within that zone it is often reduced to single lane by the cars parked alongside the regularly-used playing fields. This will further restrict emergency access, over and above those regularly reported at present.
- 9 In conclusion, the fact that DBC are not considering any additional road infrastructure to cope with the extra traffic means that LA3 fails in this respect alone of being a viable site for development.

Health, Hospital and Emergency Services:

Hospitals, emergency services

- 10 There has not been a full service hospital in Hemel Hempstead for a number of years. The Care Quality Commission inspection in September 2015 said:

"[it] requires improvement with one of the five key questions which we always rate being inadequate (well led). Two services – urgent care centre and outpatients – were rated as requires improvement."
- 11 The nearest A & E Unit is at Watford General Hospital, which is nearly 10 miles and a minimum 25 minutes from the Hemel hospital in normal conditions. The local MP, Rt Hon Mike Penning, has made regular representations about the inadequacy of healthcare in Dacorum.
- 12 To build this number of properties with the current insufficient medical facilities could only be considered irresponsible.

Doctors' surgeries

- 13 Doctors' surgeries in west Hemel Hempstead are currently overloaded. It has not been clarified whether a new surgery would be included in LA3, or merely an expansion of the already overloaded Parkwood Drive

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Surgery which is rated only 12th out of 17 in the feedback held for Dacorum on the NHS Choices website.

- 14 Even if the decision was to expand Parkwood Drive, it is questionable as to how this can be achieved. It is noted that even a written representation by one of those supporting the LA3 development (Comment ID 1658) remarks that parking is already a problem at the existing Parkwood Drive Surgery.

Education:

- 15 Education is also the responsibility of Herts CC, rather than Dacorum BC. However as with transport, the two authorities have to work together to ensure that there are sufficient school places available.
- 16 The Core Strategy indicates that a primary school is planned for LA3 but there are no plans for a secondary school.
- 17 The table below is taken from Herts CC education planning document and covers the period to 2026/27. The plan for LA3 envisages that houses will be built from 2021 to 2031. The plan below does not, therefore, appear to take any account of the people moving into LA3 who have children of secondary school age and will therefore be needing additional places; indeed the numbers start to fall towards the second half of the period covered. By Herts' own estimates, there is already up to 10.3% shortfall (2022/23) in the numbers before these additional children are

2016/17 SUMMER FORECAST - SECONDARY

19 HEMEL HEMPSTEAD			ACTUALS				FORECAST									
NO	SCHOOL	School admissions 2016	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	
	Number of Year 7 places available	1,310	1,048	1,073	1310	1310	1310	1310	1310	1310	1310	1310	1310	1310	1310	
	Demand				1121	1166	1252	1324	1351	1375	1445	1424	1382	1393	1383	
	Surplus/Shortage				189	144	58	-14	-41	-65	-135	-114	-72	-83	-73	
	% Surplus/Shortage				14.4%	11.0%	4.4%	-1.1%	-3.1%	-5.0%	-10.3%	-8.7%	-5.5%	-6.3%	-5.6%	
	No of FE				6.3	4.8	1.9	-0.5	-1.4	-2.2	-4.5	-3.8	-2.4	-2.8	-2.4	

taken into account.

Source: Hertsdirect.org –Secondary forecast 2016-7

<http://www.hertfordshire.gov.uk/services/edlearn/aboutstatesch/planning/>

- 18 In summary, there will be a net increase in family accommodation as a result of the Core Strategy/Local Allocations of 10,000+ homes including the 900 in LA3. The above school number planning does not take into account this increase, thereby raising the question of where the children of the LA3 population will be educated after 11. This further questions the viability of LA3.

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Conclusion

19 Based on the above, WHAG do not believe that full consideration has been given to the increase in traffic and the impact on health and education as a result of the new allocations, and specifically LA3.

16. In assessing the speed at which development will come forward on certain sites, has full regard been had to the proposed East Hemel Hempstead Relief Road?

17. Overall, does the Plan deal adequately with uncertainty? Is sufficient consideration given to monitoring and triggers for review?

No comments on the above by WHAG

End of document