

**Dacorum Borough Council - Site Allocations – Written Representations**

**Submitted on Behalf of Whiteacre Ltd (Respondent ID 743858)**

**September 2016**

**Matter 6 – General Site Specific Issues**

**Question One: Are the Allocated Sites Appropriate and Deliverable..?**

1. Our detailed knowledge of this aspect relates exclusively to Bovingdon, in which our direct interests lie, and that will be covered in a different session.
2. Nonetheless there are fundamental concerns about the degree of assessment which the council has undertaken thus far, which lead us to conclude that insufficient evidence exists to reach a sound decision as to whether sites are either appropriate or deliverable, at this stage of the council's plan making process.
3. There is a fundamental issue at the heart of the assessment of all 6 of the allocated sites, being that the LPA should not have been allocating sites at the Core Strategy stage at all. The council hurriedly abridged the site assessment process, so as to allocate 6 sites as part of the CS process. It was carried out without proper consultation, since the CS stage did not provide a satisfactory forum for thorough site-specific work which is only appropriate at the SA stage.
4. As an aside, the council undertook that superficial site allocations exercise (as part of the CS plan making stage) in the absence of a Green Belt analysis, which is a glaring failure in itself.
5. The council is now seeking to rely on that inadequate CS stage work as a foregone conclusion, to pre-determine the actual Site Allocations stage of the plan, where all promoted sites should be properly evaluated. It is for that reason that the council has not consulted on alternative sites in any meaningful way in the recent SA stage. It has suppressed representations made by those promoting alternative sites, some of which have been shown to better-comply with Core Strategy requirements than the 6 pre-determined sites.
6. Importantly, some of the alternative sites which were brushed aside by the council at the CS stage would now be shown at the Site Allocations stage (were it to have been conducted properly) to be both more appropriate and more deliverable than those sites which the council pre-selected at the CS stage.
7. The only way to remedy this inherent unsoundness would be to conduct the recent Site Allocations process again, only this time openly and properly, without a pre-determined outcome; enabling a full assessment of all potential sites to be undertaken, not just the 6 limited sites that were put to the public and consultees.

**Question Two: Are the Detailed Requirements of Each Allocation Clear and Justified..?**

1. The Core Strategy sets out the requirements which the allocated sites ought to not only be judged against, but which they ought to be demonstrated to be delivering.
2. The CS therefore contains clear requirements against which each allocated site must be thoroughly considered.
3. If allocated sites do not deliver what the CS states is required, then logically their allocation is not sound, and alternative / additional sites should also be considered.
4. Much as the council has set out its detailed requirements clearly in the CS, and given a proper justification at that stage; we find that they have now failed to properly assess allocated sites against those requirements, at the SA stage. Furthermore, where those sites have been shown to fail to deliver those clear and detailed CS requirements, no remedy is proposed by the council.
5. Our experience at Bovingdon will be covered in later sessions, and it will show that the clear requirements expressed in the CS have demonstrably not been met by the allocated site, and that the council has done nothing to justify that failure or to remedy it.
6. That situation is not considered to be sound, and could only be corrected by a proper published thorough analysis of the allocated site, against the clear and detailed CS requirements; and by putting forward a remedy so that allocated sites can be demonstrated to actually deliver what the CS states is needed for that settlement in the plan period.

### **Question Three: Is There a Need to Identify Additional Land for Housing..?**

1. There is a clear and pressing need to identify additional land for housing, in order to address the chronic under-delivery of housing which the council has persistently allowed to occur.
2. That is the case against past low housing figures, and even more acute against recent higher housing needs assessments, in the form of the council's very up-to-date SHMA.
3. The council's own published SHMA shows that an annual objectively assessed need exists in the Borough for 756 dwellings per annum, which equates to 11,340 over the 15 year assessment period.
4. This council is unlikely to be 'bailed out' by neighbouring authorities, and therefore must reasonably be expected to deliver this OAN within its own administrative boundaries.
5. Table 23 of the SHMA shows that Dacorum BC have recently delivered only 375 homes per annum, from 2006 to 2014. This represents a significant shortfall in the delivery of the housing which is shown to be required, where less than 50% of the required amount of housing has been delivered in recent years. Unmet need is therefore already at a critical level.
6. Furthermore the SHLAA has assessed 103 sites which are "deliverable or developable". It estimates the total housing capacity from these sites to be 11,926 over a 15 year period. That number would only be reached if all available sites are fully developed in the 15 year plan period.
7. Even taking into account the SHLAA's assumption of 510 dwellings from windfalls and 2,085 from consented sites, the identified housing land supply is 14,521 dwellings, or 128% of the objectively assessed need. This demonstrates that the council can only just meet identified demand (if a 20% buffer is found to be required, to address its recent under-delivery), again assuming all of the developable and deliverable sites in the SHLAA are fully developed in the 15 year period.
8. From the council's own masterplans, sites LA1 to LA6 have a total capacity of only around 1,600 dwellings between them (from 1,560 to 1,630 from the site allocations documents). This represents only 14% of what is required over the 15 year period. This shows an urgent need to release other sites for housing.
9. The plan could only be sound if all of the developable and deliverable sites in the SHLAA are released to meet the Borough's housing needs in the full plan period, not just the LA1 to LA6 which the plan allocates.

10. In relation to the timing of predicted housing delivery, the SHLAA trajectory predicts only 1,400 dwellings will be delivered in the first 5 years of the plan period, and then 8,231 and 2,295 in each of the following 5 year periods. This shows an unacceptably slow delivery of housing in years 1 to 5, against a pressing current and ongoing unsatisfied need. In order to be sound the council must not only allocate more sites, but should remove any artificial constraint on the timing of their delivery.
11. It is clear that the council needs to make sure that all settlements in which development can be sustainably provided are the subject of sufficient site allocations to fully provide the unmet housing need. Second tier settlements such as Bovingdon can perform a key role in delivering the housing to meet that need.
12. Turning specifically to one such settlement, being Bovingdon, in which this representor's interests lie; table 4.6 of the SHLAA shows that between 923 and 1,069 dwellings could be provided between all of the 'accepted sites' over the 15 year plan period. It shows none of them coming forward in years 0-5 or 11-15. There is an urgent need to address this problem, as the unmet housing demand exists immediately and is predicted to continue throughout the plan period. This requires of the council that they release housing sites in sustainable settlements like Bovingdon for immediate development, in order that the plan meets housing demand, and is therefore sound.
13. The published land availability data contained in the council's SHLAA, compared with the OAN in the SHMA, shows that all of the accepted sites are required to deliver the OAN for Dacorum. It therefore follows that all of the 'accepted sites' should be allocated sites. The council's Site Allocations should not therefore just be allocating 6 sites for delivery in many years from now (which is patently unsound), but in order to be sound it must allocate all available SHLAA sites, prioritising deliverable sites to come forward as soon as possible; being the only means by which there is to be any hope of meeting the OAN.
14. Having made the case above that there is indeed a pressing need to allocate additional land for housing, we turn to the aspects of the Inspector's question which relate to alternative sites.
15. We can only speak with authority about our involvement at Bovingdon. Here the council received representations from the promoters of 3 alternative sites, but chose not to publish any of those representations, either to the public, consultees or other participants, making it very difficult for most participants to provide meaningful comments to the Inspector.
16. We can therefore confidently inform the Inspector that those alternatives were put forward, but have not been the subject of any public consultation, because the council did not carry out any consultation on alternative sites in Bovingdon. The council only consulted upon their pre-determined site, being LA6 and not on any alternatives, despite 3 other sites having been actively promoted in the Site Allocations call for sites.

17. Nonetheless, we went personally to the council's offices and insisted upon seeing those representations. We were eventually allowed to read them. We urge the Inspector not only to do the same, but also to demand that the council also properly consults the public on those alternative sites. Continued failure on the part of the council to consult on alternative sites would be inequitable and renders the Site Allocations process fundamentally unsound.
18. We would envisage that those who submitted reps to the Site Allocations stage would assert that their submissions show their alternative sites to be appropriate and deliverable. We have not seen a comprehensive assessment of that evidence from the council, which would be necessary for them to arrive at a sound conclusion that those sites should be rejected, or thorough reasons for that decision, in case of each site.
19. Incidentally, we have demonstrated, through a comprehensive pre-application consultation with the council, that our alternative housing site (being Grange Farm in Bovingdon) is not only viable and deliverable, but also developable with no significant constraints with immediate effect, as soon as a planning consent were to be obtained.
20. We would welcome the chance to consult the public on its benefits and to show that it is a better option for Bovingdon than site LA6. This is covered in much more detail in our representations to date, and under matter 12. Clearly that consultation would help to make the SA process sound, where presently it has been flawed.
21. Our site's allocation would clearly assist in making the plan sound, as it could make a tangible and early contribution to correcting the reasons why the plan is presently unsound identified above.

## **Response to Inspector's Additional Note**

1. We are seeking to promote an alternative site, and therefore respond here to the Inspector's note in relation to this matter.
2. We are seeking to promote Grange Farm at Bovingdon, as a more appropriate site for Bovingdon's housing than site LA6.
3. The evidence already submitted at the site allocations call for sites stage last year sets out our case. It is not therefore repeated at length here.
4. The Inspector's attention is respectfully drawn to those submissions, and also to the evidence which we have submitted in relation to matter 12.
5. Attention is also drawn to the pre-application submission which was made to Dacorum BC in relation to Grange Farm within the last 12 months. The summary documents from that submission are also appended to our evidence in relation to matter 12. The evidence submitted to the council, together with the council's own written reply and the comments received from statutory consultees, all demonstrate that the issues raised here under Matter 6 have been fully addressed and satisfied, in our promotion of Grange Farm, Bovingdon for residential development.
6. That evidence therefore satisfies the Inspector's specific note in relation to this, matter 6.