

Dacorum Borough Council Core Strategy Examination: October 2012

Statement from CPRE Hertfordshire (Representor Id: 498429)

Issue 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt – Questions 2.4 and 2.5

Introduction

1. I am Stephen Baker and I represent the Campaign to Protect Rural England (CPRE) Hertfordshire in respect of the Dacorum Core Strategy's proposed removal of land from the Green Belt and the application of Green Belt policy.
2. This statement complements our original representations on the Core Strategy Pre-submission, which are still relevant except where updated by this statement, and seeks to address the Inspector's questions relevant to those representations insofar as they relate to Green Belt issues.
3. CPRE Hertfordshire also notes that Dacorum Borough Council proposes a large number of amendments to the Core Strategy. These are all considered by the Council to be 'Minor Changes'. Some of these amendments, which have not yet been the subject of public consultation, are relevant to CPRE Hertfordshire's representations, and will be referred to in this statement and at the hearing session on Issue 2.

Question 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?

4. In the opinion of CPRE Hertfordshire, the key issue in answering the Inspector's interrelated questions is whether the evidence exists that objectively assessed essential development can only be accommodated sustainably in Dacorum Borough if the current permanent Green Belt boundaries to its settlements are changed to facilitate such development. Only if such evidence is clearly shown to exist, would the 'exceptional circumstances', referred to in the Inspector's question, justify proposed changes to the Green Belt boundary. Even then, only changes to the Green Belt sufficient to accommodate the quantum of such development for which alternative provision cannot be made, should result in Green Belt boundary changes.

5. Our representations and statement on Issue 6: Providing Homes, are also relevant to the Inspector's question 2.4, and it is CPRE Hertfordshire's view that, objectively assessed development needs, the current economy and housing market, and national policy contexts, when taken together, invalidate the presumption in the Core Strategy that development needs in the Borough can only be met in the 'Plan period' and beyond, by the removal of land from the Green Belt.
6. We do not consider that Dacorum Borough Council has properly justified the proposed changes to the Green Belt that would facilitate the Local Housing Allocations, because the Council has not demonstrated the existence of the exceptional circumstances referred to above, and therefore the changes to Green Belt boundaries should not be made, and the proposed Local Allocations should be removed from the Core Strategy.

Question 2.5: (In the context of paragraphs 83 and 85 of the NPPF) How does the Core Strategy address the possible need to safeguard land? 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? Can the Council be confident that the green belt boundary will not have to be altered at the end of the plan period?

7. In CPRE Hertfordshire's opinion the Inspector's second question on whether a comprehensive green belt boundary review was necessary is only relevant in the event that objectively assessed development requirements cannot be accommodated without changes to the established Green Belt boundaries in Dacorum and in our view this is not the case for the reasons set out in our representations and statements.
8. This opinion is strengthened by two important changes to national planning policy:
 - Firstly, the government has recognised (NPPF, paragraph 48) that the potential of windfalls based on past history of these can be accepted in the calculation of future housing delivery within built-up areas, where the evidence for windfalls exists; and
 - Secondly, the change to Green Belt policy in paragraph 89 (bullet point six) of the NPPF to treat the redevelopment for residential use of non-residential previously developed sites as 'appropriate development' in the Green Belt, is already resulting in planning applications for such development, and can be expected to contribute

significantly to new planning permissions for housing in the Green Belt over the plan period.

9. The Core Strategy currently indicates that there is a need for 64 dwellings per year through the proposed local allocations in the Green Belt. This is based on a proposed housing target level that CPRE Hertfordshire considers to be excessive as set out in our representations and statement on Issue 6: providing Homes. CPRE Hertfordshire considers that windfalls and redevelopment of previously developed land in the Green Belt could contribute significantly to housing provision without changing the established Green Belt boundaries. The overall number of dwellings that CPRE Hertfordshire considers are required within the plan period could therefore be accommodated without changing Green Belt boundaries to accommodate the proposed Local Allocations.

Dacorum's Proposed Minor Changes to Green Belt

10. There are a few specific changes to the text (including Policy CS5: Green Belt) of the Core Strategy proposed by Dacorum Council, which CPRE Hertfordshire considers are of sufficient significance to warrant representations, and which have not hitherto been formally consulted on. They are raised now for consideration by the Inspector as part of his examination of the Core Strategy.
11. Firstly, Dacorum proposes a change (MC10) to paragraph 8.29 to state that in the Green Belt 'Development will only therefore be supported in limited circumstances', with the following text referring to 'These exceptions'. In our opinion this wording gives a misleading interpretation of NPPF policy, which requires that 'Development will only therefore be acceptable in the event that very special circumstances are shown to exist' and this wording should replace that proposed by Dacorum, together with the insertion of the word 'may' in the following sentence, to read ' These exceptions may include development.....'
12. Secondly, the proposed changes (MC11 and MC12) to paragraphs 8.30 and 8.31 relating to major developed sites in the Green Belt, do not recognise the change to Green Belt policy in paragraph 89, bullet point 6, of the NPPF, which in effect excludes from 'inappropriate development', the construction in the Green Belt of new buildings on 'previously-developed' sites as defined in Annex 2 to the NPPF. The relationship between such sites and major developed sites in the Green Belt needs to be reflected in the Core Strategy. Although there is a proposed change (in MC14) to Policy CS5 to

reflect this policy change, in our view this should also be reflected in the text of the Core Strategy.

13. Thirdly, the proposed changes (MC14) to Policy CS5 on Green Belt, fail to adequately reflect NPPF policy for the Green Belt. The Council proposes that the first sentence should state that the Council will apply national Green Belt policy to 'protect the openness and character of the Green Belt, local distinctiveness and the physical separation of settlements'. This wording fails to include the fundamentally important national policy to protect 'Green Belts' per se, not just their various attributes, in order to prevent urban sprawl (NPPF paragraph 79). CPRE Hertfordshire considers that the wording of Policy CS5 should reflect this policy.

Summary

14. In summary therefore CPRE Hertfordshire considers that parts of Policies CS2, CS3 and CS5, and the associated text in paragraphs 8.29 to 8.31 are not justified, and are inconsistent with national policy, as set out briefly in our original representations, and that some of the proposed 'minor' changes to the wording of the Core Strategy are similarly unsound as set out in the previous section of this statement.
15. A number of changes set out in our representations and above in addition to those that are best drafted by Dacorum Council are requested in order to make the Core Strategy sound.