

Dacorum Borough Council Core Strategy Examination: October 2012

Statement from CPRE Hertfordshire (Representor Id: 498429)

Issue 6: Providing Homes, questions 6.1 and 6.9 [6.2 and 6.4?]

1. I Jacqueline Veater, BA, BTP, MRTPI, represent CPRE Hertfordshire
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 relevant questions as set out in his guidance note.

Question 6.1 (part): 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?

3. Policy CS17 is not consistent with national guidance nor is it supported by clear and robust evidence. The identification of Local Allocations (LA) is not appropriate and the status of the LA policies is not clear.
4. A number of new documents supporting the Core Strategy (CS) have been published recently, including most notably the Background Paper – Selecting the Core Strategy Housing Target (SCSHT), published in June 2012 and the Site Assessments Paper, also published in June. Together these attempt to justify the decision to support a housing target that requires the removal of land from the Green Belt in order to meet that target.
5. Paragraphs 2.2 – 2.14 of the SCSHT adequately reflect national guidance contained in the National Planning Policy Framework (NPPF). Key phrases are; 'delivering sustainable development that reflects the views and aspirations of local communities' (paragraph 150), 'protecting the Green Belt' (paragraph 17), 'bringing back into residential use empty homes and buildings' (paragraph 51), 'striking a balance between delivering against objectively assessed development needs and weighing up any adverse impacts or where development should be restricted e.g. the Green Belt' (paragraph 14), 'and the five key tests for the Green Belt including 'encouraging the recycling of derelict and other urban land'(paragraph 8). However, the document then goes on to support a housing target that is contrary to all of the above.

6. Policy CS17 sets a housing target, referred to as Option 2 (medium scenario) a target of 10,750 dwellings at a rate of 430 net additional dwellings per annum to 2031 including the release of Green Belt land to provide 1550 dwellings on 6 Local Allocations.
7. We should be planning sustainably for new housing within existing urban areas or on previously developed land. Housing Growth should be in sustainable locations and if those locations are not immediately attractive to developers then the Council should be taking action to address this issue.
8. In order for there to have been meaningful engagement with neighbourhoods and the views and aspirations of local communities to be met, a housing target that reflected these views should have been set. Local residents, key organisations and the citizens panel were opposed to Green Belt development and supported Option 1 (low scenario) a target of 9,250 (370 dpa). The Council expects windfalls sites to contribute to housing supply and therefore with windfalls added this target could rise to 9,750 (390 dpa) representing an 8% uplift on current annual delivery.
9. Option 1 can be achieved without releasing Green Belt land for development and therefore achieves protection of the Green Belt as required in the NPPF. This figure that should be used in the CS with the first sentence of Policy CS17 replaced with the words “An average of 390 net additional dwellings will be provided each year (between 2006 and 2031)”. The SCSHT acknowledges that Option 1 relies on more windfalls and says that they expect more windfalls than currently allowed for (paragraph 3.56).
10. The biggest contribution to meeting housing needs is the existing dwelling stock. New build requirements will depend to a significant extent on whether good use is made of the existing housing stock and other suitable vacant property to provide homes. A complex interplay of issues affects decisions on matters such as whether to encourage lodgers, demolish or restore an empty home or provide more homes through conversions. These issues are not adequately addressed in the CS or any of the supporting documents. The SHLAA says that the numbers of vacancies and second homes is low. In this case more effort should be put into encouraging efficient use of existing dwellings and consider more closely the opportunity to re-use other vacant buildings. If spare capacity is provided then household numbers may expand to use up this spare capacity. This is not desirable in a Borough as constrained as Dacorum where capacity should be released at the right time to provide for housing needs.

11. We do not consider that the level of delivery proposed matches objectively assessed development needs. Mid 2010 population estimates revised the current population of Dacorum to 142,881 which was a drop in over 1,000 in total population since the Mid 2008 estimates. This was stated to be largely due to a decrease in estimated immigration but illustrates one of the many variables that can influence population projections. The Dacorum Housing Market Needs Assessment 2012 used 2008 based sub national population projections based on the 2001 census. These estimates are trend based projections extrapolating the effects of previous household formation activity in a different economic climate and imply that previous economic and social conditions will continue. They are not forecasts, and they are based on information that is 10 years out of date.
12. The 2011 census population figure for Dacorum published in July 2012 was 144,800. It is noted that this figure is higher than the most recent Mid-year estimates; however, no updated population projections based on the 2011 census are available. The decision on an appropriate target to meet housing needs was considered in the light of a 2008 based sub national population projection suggesting a population increase of 13.9% by 2033. Further information on the implications of this slightly higher population figure is not available at the time of preparation of this statement.
13. Although the SCSHT clearly states that it the CS does not attempt to meet this projected housing need, the choice of the Option 2 target for supply of housing has no firm basis. Issue such as the high price of housing in the borough, which helps to regulate the number of new households should be used in determining what actual demand will be.
14. The draft revision of the Regional Spatial Strategy published in March 2010 contained a housing target of 6,100 (310 dpa) for Dacorum. The housing target referred to as Option 1 (including windfalls) of 9,750 (390 dpa) is an uplift of 26% on the draft RSS. However, with the imminent demise of the East of England Plan and therefore the draft regional housing target a much higher target based on the governments household predictions could be called for. The CS needs to argue strongly that an achievable target is one that does not rely on the release of Green Belt land.
15. The Strategic Housing Land Availability Assessment is not based on meeting the targets in the current Regional Strategy and therefore is not relying on targets that are likely to be abolished in the near future. However, little effort is made to drill down further into sites which have been previously developed and may not appear to be viable. The CS

states in policy CS2, that development sites will be chosen according to a sequence of priorities, the first of which is previously developed land in and buildings within defined settlements. Since the CS was published the NPPF has added a new category of development to the third priority in this list “other land” by virtue of the last bullet point in paragraph 89 which introduces infilling, partial or complete redevelopment of previously developed land as appropriate in the Green Belt. Dacorum Borough Council should therefore be concentrating on assessing all sites that have been previously developed rather than assessing previously undeveloped sites in the Green Belt.

16. The SHLAA proposes that in order to meet the Option 2 target, Green Belt release for 1,550 homes will be necessary. It does consider the influence on land supply of the new homes bonus and the change in allocation of garden land, the latter of which it does not foresee will change significantly.
17. The SHLAA considers the removal of the national minimum density in housing developments and the need to reflect local character rather than achieving a minimum overall density. However, there are no specific density targets in the CS as alluded to by the Inspector in his question 6.8. Good design can achieve higher housing densities without damaging character of settlements. It is not sufficient to state in policy CS4 that high density is generally supported and in policy CS11 that development should respect typical density in an area. Para 3.51 of the SCSHT talks about cramming and the character of settlements being most important and therefore limited potential for additional housing on previously developed land. Higher densities can be achieved through good design. Building in the Green Belt around settlements could affect the character of settlements more than increasing densities on brownfield land.
18. The NPPF explicitly acknowledges the need to use brownfield land before Greenfield as a core planning principle. Dacorum should both encourage the recycling of derelict and other urban land with a long hard look at increasing density through good design. They should also be challenging conventional assessments of viability particularly in relation to building on brownfield land. It is not appropriate in a Borough as constricted by Green Belt as Dacorum to state that “There is limited potential to provide additional housing on previously developed land and within the urban areas. Increasing that supply would be at the growing expense of the character of settlements...” (paragraph 3.51 of the SCSHT). For example, as stated in our representations in relation to Policy CS34 of the draft Core Strategy in which we suggested an option preferable to the release of Green Belt sites would be the redevelopment or conversion of office accommodation.

19. The release of Local Allocations appears to be phased in the SHLAA. Phasing is notoriously difficult to manage. Once a site has been identified for development then developers naturally wish to develop the easiest and most viable site first. Developers can hold up supply of housing to artificially force the Borough Council to release the Local Allocations sites. In another part of Hertfordshire, developers are already seeking to gain planning permission on the Areas of Special Restraint designated around Bishops Stortford (East Hertfordshire).

20. There is no narrative to support the seemingly illogical phasing of the release of the Local Allocations. Of the 1,550 homes proposed in the Green Belt the SHLAA includes a supply of 155 of those homes in the first 5 years of the programme to 2015 which seems to be a random number not relating to any one of the Local Allocations. How many of the Local Allocations in the Green Belt are proposed to be released in the first five years of the plan, when an adequate number of houses not in the Green Belt are available? Para 4.13 of the SHLAA says that completions are likely to peak in the first 5 years. On this basis there is no justification for allocating additional capacity to be from Green Belt sites over that period.

21. In the light of the above the Local Allocations LA1 – LA6 are not appropriate. Given the national policy context set out in the NPPF, the need for the release of Green Belt land for development is not justified or founded on a credible evidence base and is not appropriate when considered against available suitable land. Exceptional circumstances do not exist which necessitate a change to Green Belt boundaries in the short term.

22. Status of the LA policies is not clear because the policy says they will be a last resort and the SHLAA using them in the first three years of the plan where it predicts there will be an oversupply. We consider that the need to release Green Belt sites in the early stages of the CS has not been justified by the evidence base and in particular the SHLAA. The CS should state that no Green Belt sites will be released for development until this action has been demonstrated as being necessary as an exception to Green Belt Policy through the thorough testing of the need for those Local Allocations proposals.

23. The uncertainty of population projections and household projections in a rapidly changing economic climate should promote a cautious approach to allocating land in the Green Belt. This is particularly true when the Borough now recognises that windfall

developments have been contributing around 8% of the annual housing completions. Irreversible decisions which are unjustified should not be taken now. The Local Allocations should be deleted from the CS and a Plan, Monitor, Manage approach should be taken instead.

Question 6.9: Will the housing needs of villages in rural areas be met?

24. Areas of Development Restraint in rural villages will help to provide for their housing needs. However, paragraph 8.9 of the Core Strategy wrongly states that they are “the least sustainable areas of the borough”. In our representations we concluded that the Council intended to say that rural villages are the least sustainable areas for significant new development. This sentence should say that they are “only sustainable for meeting the specific needs of the rural villages in which they are located”.

Summary

- The selection of the Option 2 housing target 10,750 new homes equating to 430 new dwellings per year and the provision of this target necessitating the release of 6 Green Belt sites for housing development through Local Allocations is unsound.
- The Option 2 housing target and Local Allocations are not sound because they are neither justified or consistent with national policy
- We request that:
 - 1) “3. Local Allocations (Table 9)” is deleted from Table 7
 - 2) Table 8 be revised to exclude dwelling numbers arising from Local Allocations LA1-LA6
 - 3) Local Allocations be removed from Table 9
 - 4) Corresponding textual references to Local Allocations be removed
 - 5) Policy CS17 is amended to reflect the Option 1 housing target (with or without windfalls) i.e. 370 or 390 net additional dwellings
 - 6) Consideration be given to the possibility of increasing density of housing development through good design without damaging existing urban character
 - 7) Change wording of Table 1 Areas of Development Restraint, under paragraph 8.9. The first sentence of the wording in the right hand text box should be changed to reflect our concerns.