

DACORUM SITE ALLOCATIONS PLAN

Matter 4 – Housing

Statement by Vincent and Gorbing on behalf of Taylor Wimpey and Barratt Homes and Fields End Farm LLP/Gardener Family

1. This statement is submitted by Martin Friend, Planning Director, of Vincent and Gorbing Planning Associates. Vincent and Gorbing are acting for Taylor Wimpey and Barratt Homes and Fields End Farm LLP/Gardener Family at this Examination. Taylor Wimpey and Barratt Homes are jointly bringing forward the development of the LA3 West Hemel Hempstead Local Allocation. The principle of the removal of the site from the Green Belt and its allocation for residential development is established in the Adopted Core Strategy
2. As a development of circa 900 units, the allocation represents a significant component of the Council's housing land supply. Prior to addressing the Inspector's questions with regard to Matter 4 we would comment as follows on the overall planning context within Dacorum.
3. The Council is bringing forward this Site Allocations Plan following the adoption of the Core Strategy (2013). They remain committed to an early review of the development plan and we understand that a single Local Plan will be the subject of an Issues and Options consultation in Spring 2017. We support this approach in principle. Achieving certainty – and hence encouraging the delivery of housing within Dacorum, including at LA3 – will be achieved in the short term by the Site Allocations Plan being found sound, but ensuring that longer term housing needs are addressed in the Local Plan Review.
4. The Inspector examining the Core Strategy also supported the approach of an early review to deal with longer term housing requirements. He found that the latest household projections at that time (CLG 2008 projections) were showing a requirement of some 540 p.a. whilst the Core Strategy was only proposing a target of 430 p.a. However, he accepted the plan was sound on the basis of any early review and that supply was expected, in any event, to substantially increase in the short term (CS6, para. 25).
5. The Inspector was also comforted by the role of the local allocations – including LA3 – in meeting any short term deficits and *“recommended that policy CS3 be amended to establish the timing of the delivery of the local allocations and also to refer to the*

mechanism through which the release date of a local allocation may be brought forward.” (CS6, para. 15)

6. It is also relevant to note in this context that the Inspector highlighted that *“In order to further encourage housing delivery the overall total currently being proposed by the Council should be seen as a minimum provision, pending the outcome of the review..” (CS6, para. 29)*
7. However, delivery since the time of the Core Strategy has been substantially less than the Council was predicting at the time the Inspector drew the above conclusions. Table 1 below compares actual delivery as shown in Figure 7.1 of the Annual Monitoring Report 2014/15 (BP1) with the Core Strategy Housing Trajectory.

Table 1 : Delivery of housing 2012/13 – 2014/15

	Core Strategy Appendix 2 – Predicted	AMR 2014/15 Actual
2012/13	241	290
2013/14	535	219
2014/15	668	379
Total	1444	888

8. The Council’s view is that *“Under-delivery, in so far as it exists, is related to the market and not the performance of this Council” (PC2a, page 4)*. However, one of the bases on which the Inspector concluded that the Core Strategy was sound – i.e. an imminent step change in delivery that would in any event exceed OAN at the time – has yet to materialise.
9. Moreover, in terms of Objectively Assessed Need, evidence prepared to inform the emerging Single Local Plan shows a significant increase compared to the 2008 projections that were extant at the time of Core Strategy examination. The *South West Hertfordshire Strategic Housing Market Assessment Final Report (January 2016)* concludes that OAN in Dacorum for the period (2013 – 36) is 756 p.a. (para. 10.56). Of course, it is for the South West Herts Local Authorities to determine if and/or how they can meet future OAN and it should not be for this examination to debate in detail the longer term housing requirement. However, the ‘direction of travel’ in the housing requirement since the Core Strategy is clearly and substantially upwards.
10. It is in this context that we address Inspector’s questions.

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?

11. Overall, we consider that the Council is generally taking a sound approach in ensuring that the minimum amount of housing allocated and its distribution within the Borough, is consistent with the Core Strategy. For the reasons set out above, we consider that, *at this stage*, this must be the correct approach.
12. However, we do believe that in order for the Site Allocations Plan to be considered positively prepared, there is a clear case for ensuring that the amount of housing in this DPD is maximised in order to boost supply in the short term whilst the OAN figure in the 2016 SHMA is considered through the new Single Local Plan. This is particularly so given that the Core Strategy figure is a minimum; that in any event it was below OAN at the time it was examined; and that delivery since the Core Strategy was adopted has been below what was forecast.
13. The Council have set out in their response to the Inspector (PC2A) that with either a 5% or 20% buffer they have a 5-year supply, although particularly in the case of a 20% buffer the position is marginal. This assessment is based upon the Core Strategy requirement. We would not wish to dispute this position in pure mathematical terms but do consider it reinforces the need to look at all potential mechanisms to boost supply in the short term as even on the basis of this low and minimum requirement, a 5-year supply can only just be achieved.
14. Two such mechanisms would be (i) to allow greater flexibility over the timing of the local allocations and particularly LA3, on which we comment in respect of question 3 below, and (ii) to maximise the yields from all sites – see question 10.

2. Specifically, should more housing be allocated and if so would this be possible prior to the completion of the Green Belt review?

15. Whether any other sites could be allocated whilst being consistent with the Core Strategy is a matter for the Council. However, providing more choice in supply would be beneficial. This could be complementary to allowing greater flexibility in the timing of the Local Allocations.
16. However, it should not be the role of this Site Allocations Plan to consider further Green Belt releases aside from those already committed in the Core Strategy. A full Green Belt review is underway as part of the evidence base to the emerging Local Plan. To consider this matter through the Site Allocations Plan would clearly delay its progress and entirely undermine the approach of the Council to have an up-to-

date adopted development plan whilst taking forward the review. It would delay the adoption of this DPD, result in short term uncertainty and potentially delay the delivery of the Local Allocations.

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?

17. As the Inspector highlights, the general context to the timing of the delivery of the Local Allocations is the Government's stated intention to boost significantly the supply of new housing.
18. Moreover, the Core Strategy 'target' of 430 additional dwellings p.a. should, as the Core Strategy Inspector highlighted, be considered a minimum and was accepted at the time as being below OAN. Delivery rates since the adoption of the Core Strategy have been less than expected and the direction of travel of OAN is upwards.
19. Whilst Taylor Wimpey and Barratt Homes have not sought to object to the phasing of LA3 in the plan period, this context does point to a case for not constraining the delivery of the LA3 local allocation, and the LAs more generally. If the Inspector agrees, the development could come forward sooner and would be expected to boost supply over the next five years by around 200 units.
20. In our view, given the overall benefit of boosting the supply of housing, it is unnecessary to hold back an allocated site unless there is significant harm to the implementation of the spatial plan for the area as a whole or a reason for phasing the development in relation to wider infrastructure provision.
21. However, the LA3 site accords with the key principle in Policy CS1 of concentrating development at Hemel Hempstead. In this regard, allowing the site to come forward earlier in no way undermines that strategy.
22. It is accepted that Policy CS3 seeks to hold back the Local Allocations in order to encourage a sequential approach to housing delivery with priority given to previously-developed land. The policy indicates that the sites may be brought forward if needed to maintain a five year housing land supply. However, a large development site such as LA3 has a lead-in time before housing can be delivered; it is not as if the 'tap' of supply from such a site can be simply switched on. Even if there is not a 5 year supply deficit now, if the context indicates that such a situation is likely to emerge then decisions must be taken well in advance of this occurring.
23. Moreover, the policy also states that

“The release date for development will be set out in the Site Allocations DPD and be guided by: (a) the availability of infrastructure in the settlement; (b) the relative need for the development at that settlement; and (c) the benefits it would bring to the settlement.”

24. In relation to these criteria, there are no infrastructure impediments to bringing forward development. The infrastructure requirements of LA3 are clearly set out within the policy. The need for the development and benefits clearly relate to the overall strategy of boosting the supply of housing and affordable housing in particular. A high proportion of affordable housing (40%) will be provided. A development of primarily family homes will help address the recent dominance of higher density development and smaller units. In addition, the development will provide for a new primary school site that is partly to meet the needs of the existing neighbourhood, as well as delivering Gypsy and Traveller Pitches.
25. Accordingly, allowing greater flexibility as to the timing of LA3 would not conflict with the approach of the Core Strategy. The rationale for holding back the LA3 allocation i.e. to encourage the development of pdl before the Green Belt – has essentially been weakened by the passage of time. The difference between development commencing at the end of 2018 compared to 2021 will not undermine the Core Strategy or this Site Allocations Plan. The benefits set out above will be significant.

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?

26. In respect of the LA3 allocation, we can confirm that the site will be developed and completed well before the end of 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?

27. We have commented on this issue above and support the Inspector’s analysis regarding expected versus actual completions. Poor rates of delivery since the adoption of the Core Strategy are concerning given that the Core Strategy target was

itself below OAN and the Inspector accepted it partially on the basis that delivery rates would exceed this target.

28. The Council fairly point out the impact of market conditions have reduced delivery compared to the trajectory in the Core Strategy. It is possible that more recent data will show an improvement. In the view of Taylor Wimpey and Barratt, market conditions over the last two years have improved, although the full impact of Brexit is still to be seen.
29. The Site Allocations Plan must seek to increase housing land supply but without substantively conflicting with the adopted Core Strategy. The emerging Local Plan is clearly the vehicle for considering long term housing requirements which will require much more challenging decisions including the locations of strategic Green Belt releases.
30. However, achieving the current trajectory in the plan period will rely on a choice of sites in different locations and of different types, as well as encouraging development that provides significant amounts of affordable housing. This reinforces the conclusion reached above that LAs should not be held back. It also suggests that yields from all allocated sites must be maximised, a point to which we return below.

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?

31. The Council have responded to this in PC2a and will no doubt provide further evidence to the Examination. On the basis of their own calculations, as highlighted above, they can show a 5-year supply against the Core Strategy target with either a 5% or 20% buffer, but the position is at best marginal, and reflects the low level of that target compared to actual OAN.
32. In our view there is an arguable case for a 20% buffer, based on the fact that even against the requirement of the Core Strategy, the target has not been met in seven out of the last 9 years. In terms of the NPPF, this could well be considered 'persistent'.
33. This position clearly reinforces the need to facilitate and not constrain delivery of the LAs.

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?

34. This is a matter that the Council will respond to in detail. However, there is no doubt that the LA3 site is viable. Two of the UK's largest housing developers are advancing the scheme, including instructing technical work leading to a planning application, demonstration of their confidence in the development.
35. The Council instructed their own independent viability assessment which reported in October 2013 (ID4). This found LA3 viable with a CIL rate of approximately £100 per sq.m. The Council decided through the preparation of their CIL Charging Schedule to make LA3 £0 rated, given that a S106 would be required to ensure the delivery of on-site infrastructure. We support this approach.
36. The Council has recently instructed further viability work by BNP to consider the viability of the Local Allocations where Gypsy and Traveller Pitches are proposed. This report again confirms the viability of the proposals and aligns with the views of the LA3 developers.

10. How have site densities been determined? How rigid are these figures?

37. Yields in any DPD should be indicative. Exact numbers will be determined by detailed design and development control procedures. There is a need to maximise efficient use of all sites, particularly given the housing land supply situation and the likely increase in housing requirements in the future. It would be helpful if the Plan were to state that all yields are 'indicative' unless otherwise stated.
38. With respect to LA3, the yield of 900 should certainly *not* be considered rigid and was defined by a simple net developable area of circa 30ha. x a density of 30dw/ha. based upon masterplanning work at that time.
39. Refining the master plan together with technical work being undertaken by the developers of LA3 will result in a more detailed assessment of the overall yield from the development. At the present time, it is considered that there could be some marginal increase in the overall yield from the site. Clearly, the acceptability of more than 900 units on the site will be determined through the planning application process.

13. What are the targets for the provision of affordable housing? What has been achieved in recent years?

40. The Core Strategy requires 35% of new dwellings to be affordable homes. The AMR 2014-15 (BP1) indicates that 33.8% of housing was provided as affordable units in 2014/15 and overall since 2006, 27.6% of new units have been provided as affordable housing. Numerically, this is substantially below what was planned by the Core Strategy requirement. Table 7.9 of the AMR Technical Appendix indicates a provision of 931 units (2006/07 – 2014/15). This compares to a policy requirement over the period of circa 1,354 units based on a total of 35% of 430 units p.a. over 9 years.
41. This reinforces the need to boost housing land supply as well as maximising affordable housing on individual sites. LA3 will deliver 40% affordable housing (minimum of 360 units). Allowing LA3 to come forward earlier in the plan period will clearly also benefit the delivery of affordable housing with potentially an additional 80 units being delivered in the first five years of the plan post adoption.

14. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

42. This is largely a matter for the Council. However, as the AMR indicates (BP1, para. 7.4), there has been a long term trend in Dacorum for flats to dominate the housing land supply, as a result of the dominance of high density development on brownfield urban sites. Table 7.6 of the Technical Appendix indicates that during the Plan period to date, 60% of units have been flats.
43. The release and development of the local allocations offers an opportunity to rebalance this trend. As a planned sustainable urban extension the development of LA3 will offer a balanced range of unit sizes, including a significant proportion of family homes.

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

44. Discussion on infrastructure associated with LA3 will be held under Matter 9.

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

45. Uncertainty as to future housing delivery is a clear issue and the Site Allocations Plan can only go so far in encouraging and facilitating development, which will be impacted by local and wider market influences.

46. However, the developers of LA3 are keen to contribute to addressing any uncertainty around delivery of that site, which will make a significant contribution to the housing trajectory. They will achieve this by bringing forward a planning application and seeking to ensure that development can commence as quickly as is reasonable to allow.