

DACORUM CORE STRATEGY COMMENTS ON DBC'S RESPONSE TO THE INSPECTOR'S QUESTIONS

RESPONSE ON BEHALF OF W LAMB LTD

This note is submitted pursuant to the Programme Officer's email of 1st November 2012 attaching the Council's response to the Inspector's questions. W Lamb Ltd participated in the Examination in respect of Issues 1, 2, 6 and 10. In that context we wish to comment on the following matters raised in the Council's responses.

Question 1B: Census 2011

Pending the release of all data from the 2011 Census, which will not be until after the Inspector's report is issued, it is acknowledged that only limited conclusions can be drawn as to its implications for the Core Strategy. In particular any conclusions must be proportionate to, and derived directly from, the data so far released.

Consistent with this, we for instance noted in our statement for Issue 6 (section 6.4) that the Census identifies a 'usually resident population' of 144,800 in 2011 which can be compared with the 2010 sub-national population projections baseline figure of 141,600. This suggests a higher trajectory of population growth than the 2010 projections, which themselves point to a higher growth rate than the 2008 ONS household projections. In evidence we have identified that the 2008 projections represent the latest comprehensive indicator of household growth and remain of that view. To the extent that other considerations are to be taken into account however, the latest data points to an increasing housing requirement rather than the converse.

Question 1D: St Albans

We acknowledge the stated commitment of St Albans Council to work with Dacorum BC with regard to future joint working in respect of East Hemel Hempstead. What their letter of 16th October 2012 does not say however, and which it could not say given their position, is that there is any intention on the part of St Albans Council to make provision for additional housing growth related to Hemel Hempstead.

The Inspector was advised during the Hearings that St Albans are preparing a Strategic Local Plan (Core Strategy) based on a housing provision of 250 dpa. This compares with an East of England Plan target of 360 dpa. The Council has published a Background Paper for the Strategic Local Plan entitled 'The St Albans City & District Strategic Local Plan: A Local Housing Target; Affordable Housing; Housing Type/Size/Mix'. This is available via the following link:

[http://www.stalbans.gov.uk/Images/A%20Local%20Housing%20Target%20For%20St%20Albans%20District%20\(including%20appendices\)%20August%202012_tcm15-26856.pdf](http://www.stalbans.gov.uk/Images/A%20Local%20Housing%20Target%20For%20St%20Albans%20District%20(including%20appendices)%20August%202012_tcm15-26856.pdf)

It explains that over the plan period to 2028 the Council's strategy "*is based on a compact city approach through meeting future requirements by developing within existing settlements, particularly the city and towns, rather than extending into the Green Belt.*" As regards Green Belt release, the strategy is confined

to “some limited small scale Green Belt green field residential developments where directly supported by local communities to deliver significant community benefits.”

In other words, there is no intention on the part of St Albans Council to provide for housing through Green Belt release at East Hemel in the period to 2028 and it would not be appropriate to make any allowance in the Dacorum Core Strategy for any of the Borough’s housing requirement to be met in St Albans District.

Question 2A: Strategic Sites and Allocations

We have consistently argued that the Council’s terminology is illogical and confusing. The sites which are strategically important to delivering the strategy are not allocated (i.e. they are termed local allocations for consideration in a subsequent DPD) whilst sites which are of local significance are described as strategic allocations.

However, whilst it may be possible to alter the terminology to improve this situation (and we would support that), there is no practical scope within the Core Strategy as currently drafted to deal with the principal issue which arises from it – namely the absence of strategic allocations in the Core Strategy to bring forward the most important sites.

We also do not accept, and the Borough Council has contended, that the ‘local allocations’ are contingent sites. They are essential to meet the housing requirement. Indeed, as the Inspector will be well aware, W Lamb Ltd submits that additional land is required, hence the Shendish proposal.

Question 6C: Policy CS17

The Borough Council’s position on this matter is accepted.

Question 10A: Observations on Decisions - (a) Riviera Way, Torquay

We cited this decision in the Hearings session, in order to identify a single and straight-forward point. At para. 52 of the decision notice the Inspector states: “*In my judgement the CLG 2008-based household projection figures constitute the most reliable up-to-date figures....*”. That is a conclusion directly applicable to the Dacorum Core Strategy. We did not, and still do not, seek to attach any weight to the decision in any other respect and consider therefore that much of the Borough Council’s commentary in their response to the Inspector’s question is superfluous and irrelevant.

Interestingly in the Torquay case however, the Appeal Inspector was faced with a situation where the 2010 sub-national population projections were pointing to a decreasing housing requirement. That is not the case at Dacorum. Our comments on that are set out in response to Question 1B above.

David Lander
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