DACORUM CORE STRATEGY EXAMINATION

STATEMENT BY VINCENT AND GORBING ON BEHALF OF TAYLOR WIMPEY UK LIMITED

Issue 2 : The Distribution of Development (settlement hierarchy) and the Green Belt

This statement has been prepared by planning consultants Vincent and Gorbing on behalf of Taylor Wimpey UK Limited.

Taylor Wimpey ("TW") control land which forms part of the area to the west of Hemel Hempstead that is broadly identified as a Local Allocation in the Core Strategy (LA3). TW have been working with the Council and the other landowners in order to bring forward the allocation, demonstrating its environmental acceptability and its deliverability.

Inspector's Issues and Questions

2.1 What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the sustainability appraisal support the chosen hierarchy?

The history of the preparation and production of the Core Strategy clearly demonstrates that the Council have considered various strategies – from full concentration at Hemel Hempstead to a dispersal strategy – and has identified a balanced approach taking into account housing need, environmental constraints, employment and infrastructure provision.

In our view, the hierarchy as now defined in Table 1 strikes the correct balance between focusing development in the key settlements, and Hemel Hempstead in particular, whilst allowing for demonstrated local needs to be met in smaller settlements and rural areas. Concentrating growth in Hemel Hempstead has clear sustainability advantages, reducing the need to travel to employment, services and amenities and increased use of previously development land. The growth in key settlements will help to support the needs in the towns and maintain the communities within these settlements. This balanced approach is supported by the SA.

2.2 Is the site selection process based on appropriate criteria?

In relation to the sites at Hemel Hempstead, the Council have been through a number of exercises taking account of *inter alia* environmental constraints, infrastructure and deliverability, transport and accessibility, economic development considerations, Green Belt and landscape character, and conformity with established New Town principles. We consider that the Council has consistently applied appropriate criteria in order to define the sites now identified within the Core Strategy.

2.3 What is the justification for holding local allocations in reserve? What will be the process for bringing forward their release and is it set out in sufficient clarity?

Whilst TW would, of course, prefer to be unfettered in relation to the timing of the release of their land at West Hemel Hempstead, we understand the Council's desire to husband the supply of land in order to ensure that greenfield sites in particular are not developed before they are needed to meet the overall housing requirement or address particular infrastructure issues. The policy basis for managing the Local Allocations (CS3) allows a certain degree of flexibility and rightly highlights the need to define the timing of their release through detailed work on the Site Allocations DPD. TW have raised no objection in principle to Policy CS3 but do suggest that criterion (a) should be the subject of a minor amendment to state that development will be guided by *inter alia* "the availability <u>of existing and the proposed provision</u> of <u>new infrastructure in the settlement.</u>" This is implied in criterion (c) which allows for the benefits of development to guide the timing of release: such benefits could arise from the provision of new infrastructure associated with the development of the local allocations and it is suggested that this change might help clarify this point.

TW have already made clear to the Council that in respect of land at West Hemel Hempstead (LA3), the detailed work through the Site Allocations DPD will need to consider the lead time required in order to achieve the necessary planning permissions and provision of early infrastructure in order to ensure that the housing is delivered at the appropriate time. In terms of meeting housing needs, the key is not, therefore, the timing of planning permission being granted or a material start on site, but the timing of the availability of completed units. Consequently, whilst the housing trajectory shows that the greenfield requirement may not be needed until 2021/2022, a considerable amount of work will be needed to ensure that this is timescale is met.

The identification of the land in the Core Strategy will provide certainty for technical and planning work to proceed. The Council have made clear to TW and the other landowners with interests at LA3 that their work on the Site Allocations DPD will progress immediately after the Core Strategy in order that the timing of the release of the land be considered in more detail. TW are content that this is an appropriate way to proceed.

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?

In relation to Hemel Hempstead, the Council has undertaken significant work to consider urban capacity and the need or otherwise to release Green Belt to meet housing needs. The identification of possible Green Belt releases – as at LA3 - has been fully justified by the evidence base such that exceptional circumstances exist to warrant the amendments to the Green Belt now proposed. Failure to allow for some modest removal of land from the Green Belt will result in an under-supply of housing and would render the Core Strategy unsound for this reason. In any event, the management of the release of the sites will ensure that their role and function as Green Belt will remain until such time as they are needed to meet housing needs.

2.5 Paragraph 83 of the National Planning Policy Framework refers to the permanence of the green belt in the long-term so that they should be capable of enduring beyond the plan period and paragraph 85 refers to the identification of safeguarded land. 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?

These matters are largely for the Council to address. However, we consider that given the amount of development required on greenfield allocations, and given the opportunities that exist, the Council has taken the correct approach in identifying specific allocations rather that undertaking a full Green Belt boundary review. At Hemel Hempstead, the Council has considered a whole range of options in relation to urban expansion and concluded in favour of the LAs now proposed. This has taken account of Green Belt boundary considerations alongside a wide range of other sustainability factors in order to ensure that the releases are appropriate.

2.6 How and when will settlement boundaries be reviewed?

We only comment here on our understanding in relation to LA3. The Core Strategy does not define the exact settlement boundary at this location. It will be for the Site Allocations DPD to undertake this process as an element in the next stage of masterplanning of the site.