

5th September 2016

16 Cross Furlong
Wychbold,
Droitwich Spa,
Worcester
WR9 7TA

Dear Ian Kemp

Re: Representations on Dacorum Borough Council's Dacorum Site Allocations Development Plan Document 2016

We are submitting a further written representation on behalf of both St William Homes and National Grid Property in response to the draft Dacorum Site Allocations Development Plan Document (DPD). The partnership St William Homes LLP (SWH) is a Joint Venture formed by the Berkeley Group and National Grid Property (NGP) which has been established to lead the regeneration of redundant gasholder sites across London and the south-east.

St William has the potential to provide a significant programme of new homes across the wider south east, the partnership will combine the design and housing delivery expertise of Berkeley with National Grid Property's portfolio of redundant brownfield sites to deliver new high quality places for people to live. These sites will see land remediated and restored to play a positive, useful role in each community. The developments will offer the opportunity to deliver a broad mix of homes as well as creating thousands of new jobs and significant contributions to local infrastructure and amenities.

The site to which this representation relates is identified within the draft Site Allocations DPD (Jan 2016) document as 'H/2 National Grid and 339-353 London Road, Hemel Hempstead' (H/2) which is currently owned by NGP. Within their draft DPD, the Council identifies this site within Part 1 (a) of the document as a 'housing allocation', of which St William and National Grid remains fully supportive.

SWH shares Dacorum Borough Council's commitment to delivering new homes and regeneration. The future redevelopment of the above-mentioned site provides an opportunity to significantly contribute to regeneration in the borough and to deliver a substantial number of new homes, which would help the borough meet its housing targets. As indicated further in this representation, this accessible brownfield site has the opportunity to deliver a sustainable and high quality residential led scheme and achieve in excess of 400 new homes.

Previous representations have been submitted to support this allocation for residential development; however, following discussions at a meeting with the Council on 17th August 2016, it has been necessary to prepare this written representation to further support the Council in the preparation of their Examination Hearing Papers and justify a proposed 'Main Modification' to the draft DPD.

Site Description

The 4.1 hectares (10.13 acres) site is located south of Hemel Hempstead Town Centre in the Two Waters area and comprises a Pressure Reduction Station (PRS), ancillary buildings, an office building, industrial shed and four cottages. It is within a mixed residential and commercial area with the railway line and train station close to the site to the south and west respectively; Boxmoor Common, an area of open space is located to the north. There is limited vegetation on the site and a public right of way runs southwards from London Road, through the site towards the railway line. Part of the footpath is elevated on a footbridge over the entrance to the eastern part of the site.

Site Technical and Design Work

In 2008, on behalf of NGP, Vincent & Gorbing Planning Consultants undertook a high level masterplan exercise in order to inform a submitted consultation response on the Site Allocation Issues and Options DPD. This initial masterplan consisted of 168 dwellings formed predominantly of houses and two / three storey buildings and indicated to the Council that the site could come forward for housing. Although it identified the site as suitable for housing, the initial masterplan failed to respond to the now known technical requirements of National Grid and the requirement to relocate the Pressure Reduction Station within the site. Since 2008 further site analysis indicates there to be significant site enabling costs associated with the former gas works site, the required remediation works and diversion of existing below ground gas infrastructure. In addition, the 2008 masterplan did not make the most efficient or effective use of this brownfield site in line which pre dated the NPPF introduced in 2012. Given the greater detail of understanding about the site and its constraints it is paramount that the optimisation of the available brownfield site is realised in order to secure a financially viable development and achieve housing delivery.

The Pre-Submission Site Allocations DPD was published by the Council for consultation in September 2014 allocating the site for solely residential development, accordingly representations were submitted on behalf of NGP relating to the Hemel Hempstead Site. The 2014 written representation stated:

'The Net Capacity of the site is set at 160 dwellings which is also considered reasonable, though this should not be set as a strict limit if it can be demonstrated that a higher number of units could be provided with no adverse impact.'

Since this time, the Joint Venture of SWH has been established and work has progressed. Specifically, in January 2016 SWH undertook further detailed capacity work to bring forward a revised masterplan focussing on a more efficient layout, a revised mix and a predominant apartment led scheme. The updated design work has also been informed by 'up to date' market demand, the sites sustainable, edge of town centre location and the planning policy steer of increased delivery in order to meet the higher need for housing in the south east. As a result the revised January 2016 masterplan indicated the site capable to deliver significantly higher numbers than the current 160 dwellings proposed within the draft DPD; it is suggested that the site could achieve in excess of 400 new homes.

In April and May 2016 NGP and SWH met with senior Council Officers to present and discuss these revised proposals. The feedback from the Council was generally supportive in respect to the updated design principles and the higher number of homes. Both SWH and NGP share the Council's aspiration to deliver new homes as identified in their 5 year housing supply and are committed to continue to work with the Council, aiming to begin formal pre applications discussions in 2017, with first housing completions by 2021.

Matters, Issues and Questions

Given the shift in SWH's and Dacorum Council's approach and vision for the H/2 site, at this stage of the plan making process there are a number of matters raised by the Planning Inspector which we wish to comment on at this stage:

Matter 2 – General Matters

Following proactive dialogue with Dacorum Council officers in relation to the former Gas Works site, we understand that the Council are proposing a Main Modification to the draft Site Allocations DPD that would increase the site capacity listed for 'H/2 National Grid and 339-353 London Road, Hemel Hempstead' from 160 homes to 350 homes. This proposed Main Modification is justifiable for a number of reasons:

- The high level technical work which has now been undertaken
- Updated design feasibility work undertaken indicating that an increase in density, revision of housing mix, and a significant increase in homes is deliverable whilst maintaining a high quality scheme responding to its surrounding physical context.
- Identified enabling costs and financial viability challenges.
- Commitment to the delivery of homes by the current land owner and willing developer with extensive proven track record of housing delivery

- The wider Development Plan context; delivery on brownfield sites as a preferred approach to green belt release and ensuring most efficient use of brownfield sites within sustainable locations.

At this late stage of the plan making process of the Site Allocations DPD, the overarching principle of increased housing capacity from 160 to 350 on the H/2 National Grid and 339-353 London Road site as a main Modification is supported; however, it should be noted that SWH consider the site to be able to support in excess of 400 new homes and as such, modifications to the wording within the H/2 policy allocation should allow for future flexibility to ensure longevity of the Development Plan policy.

Matter 4 – Housing

The delivery of homes on the H/2 National Grid and 339-353 London Road site would be consistent with adopted Core Strategy policy. As set out above, SWH consider that over 400 homes could be delivered on site as a result of updated design feasibility and some initial technical work undertaken.

The Council now have the opportunity to allocate a greater number of homes on a previously developed site prior to their completion of the Green Belt Review. As indicated previously, the allocation of more homes on brownfield sites such as this, will relieve pressure for the Council to meet their housing growth targets and need on allocated Green Belt or green fields sites.

With regards to the timetable of delivery, SWH are targeting a submission of a full planning application by Autumn 2017 and forecast a minimum of 100 completed homes by 2021, thus indicating some delivery within the first 5 years of the Council's housing supply. All homes are forecast to be delivered within the lifetime of the Development Plan Document. This high level programme incorporates the two years of site preparation works required ahead of any construction of housing. Commitment to this programme has already been demonstrated through the demolition of the three redundant gas holders, termination of commercial tenancies and expenditure on design and technical consultants.

The initial technical work undertaken indicates that although site enabling costs are extremely high, the provision of higher densities, higher number of homes and a flexible approach undertaken by the Council will allow for housing delivery on the site. The higher densities have been demonstrated through the updated design work presented to the Council in April/May 2016.

SWH supports the Council's proposed 'Main Modification' as it demonstrates the Council as being proactive in its approach to housing delivery through:

- Engaging with landowners and developers to promote the redevelopment of appropriate brownfield sites

- Pushing for the optimisation of brownfield sites as a means to address any future shortfall in housing completions and/or delivery of sites identified within the Housing Programme.
- Seeking to increase delivery of homes on Brownfield sites in order to reduce reliance on Green Belt, green field and windfall sites
- Providing a greater certainty of the pipeline of housing completions through its proactive engagement with NGP and SWH and its support in promoting more new homes on H/2 site.
- Securing higher densities in more suitable locations

Matter Six – General Site Specific Issues

SWH's early investment in site preparation and subsequent discussions with Dacorum Council have demonstrated that this National Grid owned site is available for development. The points set out earlier in this representation indicate the site's appropriateness for development.

Whilst the site boundary is correctly illustrated and defined, to make the allocation fully transparent, justifiable and to allow the policy to be considered flexible, it is strongly suggested that the site description within the Site Allocations DPD should be amended as follows:

'Brownfield site upon which comprehensive residential development is sought at a density considered appropriate for its town centre and highly accessible location. Main access from London Road. Secondary access from Stratford Way to serve rear of site is acceptable dependent upon number of units proposed and impact on existing trees. Existing footpath to be retained and enhanced. The site will need to be decontaminated and restored and as such a flexible approach to viability maybe required. Given the sites location, a mixed scheme of predominantly flats is sought, respecting the adjoining commercial area, residential area and semi-rural character of Boxmoor. The retention of trees is encouraged. The development should be designed to safeguard the amenities of adjoining residents. In this instance, given the unique characterises of the site and previous use, the number of homes allocated for this site is seen as a minimum.'

Summary

This written representation has been submitted in relation to the Dacorum draft Site Allocations DPD and supports the Council's proposed Main Modification to increase housing capacity numbers from 160 to 350 for the 'H/2 National Grid and 339-353 London Road' site.

Various supporting work has been undertaken and discussions have been carried out with the Council providing justification for an uplift of housing numbers within the draft allocation. It has been

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demonstrated that the site is appropriate for housing, deliverable and able to meet some provision of the Council's 5 year housing supply whilst reducing the Council's reliance on Green Belt release.

Whilst the site itself presents many challenges and complexities, there is a clear commitment by SWH to bring forward a planning application for redevelopment of the site to regenerate and deliver the needed homes.

The increased number of homes allocated for the former Gas Works site is supported; however, policy wording will be needed to allow for a flexible approach. The suggested amendments made in this representation will ensure integrity for any future redevelopment and will provide sufficient longevity of the policy itself.

We note that the examination of the DPD has been programmed to take place in October 2016 and if need be, we will be happy to attend if requested. In this regard, we would be grateful if you could keep us informed of progress in relation to the examination.

Should you have any comments on these representations or wish to discuss them further please contact Matthew Rees, Senior Development Manager at St. William, on either 0203 725 8980 or matthew.rees@stwilliam.co.uk.

Kind regards



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Stewart Kellie
National Grid Property