

Examination of the Dacorum Core Strategy

Inspector's Preliminary Findings on Matters Relating to Housing Provision and the Green Belt

19 November 2012

1. Following the close of the hearing sessions into the Dacorum Core Strategy (CS) and having considered all the evidence, including the answers to the questions I posed during the hearing sessions (and the subsequent consultation responses), I consider that there is a shortcoming in the document, relating to soundness, which the Council may wish to address. The purpose of this note is to explain the basis for my concern and to invite the Council's view on how it should be resolved. It should not be taken as my conclusion on the soundness of the CS.

2. The Council confirmed that in its view 11,320 dwellings over the plan period would meet objectively assessed needs (as referred to in paragraph 14 of the NPPF). However, in my view that figure does not represent full objectively assessed need, rather it represents a level of development that in the Council's opinion could be satisfactorily accommodated in the Borough without detriment to other policy constraints as set out in the NPPF.

3. I consider the starting point should be the identification of full 'objectively assessed needs' (paragraph 47 of NPPF). The most recent CLG household projections¹ indicate a need for 13,500 new households in the Borough (about 540 dwellings a year) over the plan period and there is also a significant need for affordable housing. The population projections also identify a significant growth². Whilst I understand the Council's concerns regarding the robustness of the figures, I am mindful of the advice in paragraph 159 of the NPPF regarding meeting household and population projections.

4. Having identified the full need, the Council should then have undertaken the appropriate analysis to ascertain whether or not that full need for market and affordable housing could be met, remembering that the objective is to 'boost significantly the supply of housing'. It may be that the Council would have reached similar conclusions as it has done in relation to the submitted Core Strategy but without a more thorough analysis I cannot be certain that this would have been the case.

5. I have two specific concerns: the lack of a robust and comprehensive green belt review and the limited emphasis that appears to have been given to the role that neighbouring local planning authorities could play in accommodating some of Dacorum's housing needs.

¹ CLG 2008 based

² ONS Interim 2011 based projections

6. Whilst it is correct that great importance should be attached to green belts, paragraph 83 of the NPPF advises that green belt boundaries should be capable of enduring beyond the plan period and bullet point 3 of paragraph 85 suggests that 'safeguarded land' could be identified to meet longer term needs, stretching well beyond the plan period.

7. Documents HG10³ and HG15⁴ assess a number of sites against a range of criteria, including impact on the Green Belt and there is no reason to challenge, in themselves, the conclusions that are drawn. However, there appears to be little weight given to accommodating the full objectively assessed housing need, as identified for example in the CLG projections.

8. I acknowledge that the situation may change but there is no reason to conclude that the needs for housing in Dacorum Borough will not continue to grow beyond 2031. In these circumstances and bearing in mind the tight constraint which the green belt imposes (together with the AONB elsewhere in the Borough) I am not satisfied that longer term development needs could be satisfactorily accommodated.

9. With regard to neighbouring local planning authorities making a contribution to meeting the housing needs of Dacorum, this is clearly not a new concept, particularly in terms of St Albans City and District (which is immediately to the east of Hemel Hempstead). Hemel Hempstead is rightly identified in the CS as the main centre for sustainable development and change in the Borough and in my view every opportunity for re-enforcing the role of the town and making the best use of the facilities and services that it provides should have been robustly assessed (together with any consequential infrastructure improvements).

10. Whilst it is clear that Dacorum and St Albans have 'co-operated', particularly with regard to the joint Area Action Plan, it appears to me that the co-operation was directed more towards securing protection for the land in St Albans District between Hemel Hempstead and the M1, rather than investigating ways in which the area could contribute towards meeting the full housing needs of Dacorum. Bearing in mind the conclusion in HG10 that 'if significant expansion of Hemel Hempstead is required, this should be taken forward in the form of the eastern growth option' (i.e primarily within St Albans City and District), then I consider the Council should have attached greater weight to the role that this area could play in meeting the Borough's housing needs more fully.

11. In summary there is insufficient substantive evidence to enable me to confidently conclude firstly that the figure of 11,320 dwellings represents full objectively assessed need; secondly that the housing needs of Dacorum up to 2031 could not be met more fully than is currently proposed without causing significant harm to interests of acknowledged importance; and thirdly that future needs (i.e. post 2031) could be satisfactorily accommodated without a review of the green belt.

³ Assessment of Alternative Growth Scenarios for Hemel Hempstead (April 2009)

⁴ Assessment of Potential Local Allocations and Strategic Sites (June 2012)

12. The Council will wish to consider the options available to it but one of those options may be to commit to an early partial review of the CS (by way of an appropriate Main Modification), in order to investigate ways of assessing and meeting housing need more fully (taking into account updated household and population projections). Any such partial review would need to consider the identification of a housing target that closely reflects identified need; a thorough review of the green belt boundary (including the potential for safeguarded sites); and the role that effective co-operation with neighbouring local planning authorities could play in helping to meet the housing needs of Dacorum.

13. Other options available to the Council could include requesting a suspension of the Examination in order to undertake further work; the withdrawal of the CS; or a request that I complete the Examination on the basis of the submitted CS. However, the latter option carries the significant risk that I would not be in a position to find the CS sound.

14. In the light of the potential shortcoming I have identified, I am inviting the Council to provide an indication of how it wishes to proceed, remembering that in order for me to recommend modifications to the plan the Council will need to formally notify me if it wishes to request modifications under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).

15. In order to make progress as quickly as possible it would be appreciated if the Council could respond to this note by Monday 3rd December at the latest.

David Hogger

Inspector