

DACORUM SITE ALLOCATIONS PLAN

Matter 9 - Policy LA3: West Hemel Hempstead

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.

Background to the LA3 Allocation

2. Prior to addressing specifically the Inspector's questions, it is worthwhile briefly reviewing the background to the allocation of this site and its role in the development plan.
3. Much of the background to the allocation of the site through the Core Strategy is set out in the Joint Statement to the Core Strategy examination (document LA30). The potential to expand Hemel Hempstead onto land adjoining Warners End and Chaulden has been considered over a prolonged period. In preparing the Core Strategy, the Council considered the options available to accommodate housing in and around Hemel Hempstead, recognising that urban capacity alone would be insufficient to meet longer term housing needs and that some Green Belt release would be necessary.
4. The land was considered as an option in the "Growth at Hemel Hempstead" consultation in November 2006 and featured in options within "Assessment of Growth Scenarios for Hemel Hempstead" in March 2009. An "Assessment of Local Allocations and Strategic Sites" published in October 2010 assessed the relative merits of different development options on the edge of the borough's towns and large villages, incorporating independent advice on a number of matters including *inter alia* sustainability and highways issues, as well as the policy advice of the then extant PPG2: Green Belts. The LA3 allocation was seen as sequentially preferable after Marchmont Farm (now LA1) and a small Green Belt release at Fletcher Way in Hemel Hempstead (now LA2).

5. Significant technical work was undertaken during the preparation of the Core Strategy in order to comprehensively assess the deliverability of LA3. This covered ecology, landscape and visual impact, archaeology, flood risk, utilities and ground conditions (LA31 – 34, LA36 – 38). A detailed Means of Access and Transport Appraisal was also undertaken (LA35).
6. The Core Strategy was found sound and the LA3 allocation confirmed as part of that strategy. As a development of circa 900 units, the allocation is a key site within the Core Strategy.
7. Since that time, the developers have worked jointly and closely with the Council in preparing the draft masterplan for the site which, as the Inspector is aware, has been the subject of community engagement and consultation.
8. The current position is that the developers have now instructed a full consultant team to bring forward the site to planning application stage, accompanied by an Environmental Impact Assessment. The work has been jointly instructed and will cover the whole allocation. A schedule of the work being undertaken and progress to date is attached as Appendix 1. Importantly, all Phase 2 ecological studies are being undertaken during this year during the appropriate seasonal windows. EIA Scoping has been undertaken. It is expected that a planning application will be brought forward at the end of 2016 or early 2017. In this context, it is important to emphasise that the principle of development of the land at LA3 is already established through the Core Strategy. Clearly, as a daughter document to the Core Strategy, this Site Allocations Plan must be broadly consistent with it and it would be inappropriate at this stage to re-open the acceptability of the allocation *in principle*, particularly given its importance to the housing trajectory. The very special circumstances for amending the Green Belt boundary in this location have already been accepted.
9. It is, however, important to ensure that the policy basis for dealing with forthcoming planning applications is clearly articulated in the Site Allocations Plan.
10. The current technical work – including consideration of environmental impacts and highways and infrastructure issues – is predicated on sensitivity testing the capacity of the site up to a yield of 1000 dwellings. As set out elsewhere in our representations, the capacity of any development site in a DPD should only ever 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. 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.

11. 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.
12. In our view the policy should state a 'minimum of 900 units.' Clearly, the acceptability of more than 900 units on the site will be determined through the planning process.
13. Turning to the Inspector's questions, we comment as follows.

1. Is the policy wording in relation to the submission of an outline planning application sufficiently flexible?

14. The Focussed Changes introduced the following new wording :-

"The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions." (MC25)

15. Although we support the need to plan the allocation – and in particular supporting infrastructure – on a comprehensive basis, this wording raised some concerns as it required one outline planning application covering the site as a whole, thereby limiting flexibility. Although a single outline planning application for the majority of the allocation (i.e. that controlled by Taylor Wimpey and Barratt) is possible, this should not be an imposition of policy. It is possible, for example, that two outline applications could be made in parallel, or a hybrid application comprising a detailed application for the early phases and an outline for the remainder.
16. In our representations we suggest the following wording :-

"The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate broad compliance with the Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations."

17. The Council now propose this wording in their List of Proposed Amendments to the Site Allocations Pre-Submission (Table 4 of SUB4), albeit the word 'broad compliance is omitted. We would suggest that since any master plan must necessarily be a flexible framework, it is appropriate to retain the word 'broad' in the policy.

2. Should the policy reflect the developer of the site will only be required to carry out upgrading of the drainage infrastructure directly related to the site?

18. The Council introduced MC26 to make more specific the requirement to *"identify any infrastructure up-grades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site."*
19. We were concerned that such a requirement could lead to unreasonable demands being placed on the development, contrary to the requirements of the CIL regulations and National Planning Guidance that any obligation must be necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development. Our suggested alternative wording is :-

"Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades that are required as a result of the development, and not otherwise funded through CIL or other infrastructure investment plans of the Council or statutory undertakers, in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site."

20. It should be said that early and helpful discussions have been held with Thames Water such that there is an agreed strategy for dealing with the sewerage from the scheme.

3. Has full consideration been given to the increase in traffic associated with the development and the pressure on existing schools and healthcare facilities?

21. All three of the issues raised by the Inspector have been and continue to be the subject of detailed assessment and investigation. Inevitably, at each stage, from site search, to allocation, to planning application, the level of detail of this analysis progressively increases.

Highways

22. As set out above, a detailed Means of Access and Transport Appraisal was undertaken in May 2012 (document LA35). This considered residential housing up to 900 units, a 2FE primary school and community uses including a doctor's surgery. As set out in the Joint Statement to the Core Strategy, this report concluded that with

the land being developed and with general growth in traffic, a number of local junctions will near capacity and requires some form of improvement. The necessary junction improvement works would be relatively minor and could be accommodated within the highway boundary (for example at Boxted Road/Long Chaulden/Northridge Way junction in Warners End). The Highways Authority raised no objection to the LA3 allocation in the Core Strategy.

23. Furthermore, the Council and the County Council as Highways Authority have included LA3 in the Hemel Hempstead Transport (Paramics) Model, which was updated in July 2015 (Document TR1). This adopts 'worst case scenario' trip rates. Whilst it highlights capacity issues on parts of the network it indicates that relatively small scale improvements are needed that are achievable within existing highway boundaries. In so far as LA3 is concerned, this is consistent with the conclusions of the LA35 report.
24. The forthcoming planning application for the site will, of course, be supported by a full Transport Assessment. This will update all previous modelling and refine access proposals and any off-site improvements required as part of the development. Discussions with the Highways Authority and Highways England are on-going.
25. From all of the work to date, there is no evidence that the transportation impacts of the development cannot be positively addressed.

Education

26. The LA3 policy requires that the allocation delivers a new 2FE primary school. Hertfordshire County Council has been party to the discussions regarding the infrastructure requirements of the site over many years. Pupil planning in the area highlighted the need for additional primary capacity, partly to meet needs arising from the existing neighbourhood and partly to meet the pupil yield from the development itself.
27. The exact timing of the delivery of the school will be the subject of further discussions with HCC as the planning application is brought forward. The S106 agreement will ensure the provision of a suitable site and education contributions related to the pupil yield from the development.
28. The allocation will therefore contribute positively to education provision in the area.

Health

29. The requirement of policy is to provide a doctors' surgery. An existing surgery, known as Parkwood Surgery, is located on Parkwood Drive, off Long Chaulden,

approximately 900m from the Long Chaulden access into the site. There are a number of options in terms of enhancing health care provision. As set out in the draft Master Plan, GP provision could be in the form of an extension to the existing surgery, provision of an on-site satellite surgery for Parkwood, or accommodation for a new practice on-site.

30. Discussions with stakeholders are on-going in this regard but the development will ensure that the demands on local healthcare arising from new residents will be met.

4. Should the site come forward prior to 2021 if it is available?

31. We have made further comment on this issue under Matter 4. There are two issues, namely: is it possible for the site to deliver units prior to 2021; and, if so, would it be beneficial for it to do so.
32. Taylor Wimpey and Barratt Homes could deliver units at LA3 prior to 2021 if a more flexible policy approach was introduced. Completion of detailed technical work will allow for a planning application to be brought forward in late 2016 or early 2017. In order to foreshorten the time from an outline planning application to achieving detailed permission, it would be possible to bring forward a detailed Phase 1 application in parallel, or use the approach of a 'hybrid' application (part outline, part detailed). Realistically, following the achievement of all necessary consents and enabling infrastructure being constructed, this could see new housing being delivered commencing in Q4 2018 or Q1 2019. Delivery rates of 50 units per year from each developers' outlet is a reasonable assumption although in the first year delivery would be less as development momentum is achieved. Accordingly, the site could delivery circa 200 units from commencement to April 2021. Some 40% (80 units) would be affordable housing and there would be a mix of units sizes, with a focus on family accommodation.
33. Accordingly, if the Inspector concludes that there is a need to boost housing supply in the forthcoming five year period, LA3 could make a significant contribution in this regard.
34. As we set out in our representations to Matter 4, there is a case for allowing this flexibility. NPPF makes clear that the Government's intention is to boost the supply of new housing. There has been a period of under delivery in Dacorum against Core Strategy requirements, emphasising the need to provide a choice of sites in order to increase supply. The Core Strategy requirement was lower than OAN even in 2008 but was accepted by the Inspector partly on the basis that delivery predictions indicated that the requirement would be exceeded. This has yet to materialise. Moreover, the most recent SHMA shows a substantial increase in OAN.

35. In this context, it would seem 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.
36. In terms of the overall spatial strategy for Dacorum, 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.
37. 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. However, the policy 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.”*
38. 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; the development would provide greater choice in relation to the type of housing and help to rebalance provision following a period which has seen a significant dominance of flatted high density development. In addition, the development will provide for a new primary school site that is partly to meet the existing neighbourhood, as well as delivering Gypsy and Traveller Pitches. There is no doubt that early delivery would be beneficial.
39. The result of greater flexibility in the timing of delivery could be the addition of around 200 units in the period 2016 – 2021. This would clearly represent a welcome boost to supply. However, the housing trajectory forecasts delivery of 3,624 units during that period; given this scale of development, the addition of 200 units will not make a material difference to the delivery of pdl sites during that period and not undermine the overall sequential approach.

5. Is a reference needed in the policy to ecology and the link to Shrub Hill Common Local Nature Reserve?

40. The policy already highlights that the development will deliver:-

“extension of Shrubhill Common Nature Reserve and the creation of wider green infrastructure links.”

41. Under (d) Open Space, the policy further requires

“Arrange for the open space to ensure a pleasant, coherent and wildlife-friendly network throughout the neighbourhood.”

42. These requirements are sufficient to ensure that biodiversity is suitably dealt with in the design of the development.

6. Is the site viable with the provision of a traveller site?

43. We have submitted a separate statement in respect of Matter 3. 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 confirms the viability of the proposals and aligns with the views of the LA3 developers.
44. The developers of LA3 do not consider that the proposed Gypsy and Traveller Pitches at LA3 will impact on overall viability. Their location and delivery is being carefully considered through detailed work presently underway in advance of a planning application. As highlighted above, delivery of these pitches is another benefit of early delivery of LA3 overall.

APPENDIX 1

ON-GOING TECHNICAL WORK

LA3 : West Hemel Hempstead - Ongoing Technical Work

The table below outlines the technical work which is on-going as of August 2016 to inform the chapters of the Environmental Statement and wider planning application.

Discipline	Specific Work	Consultant	Current Position
Ecology	Extended Phase 1 Habitat Survey	CSA Environmental	Completed
Ecology	Hedgerow Survey	CSA Environmental	Completed
Ecology	Botanical Survey	CSA Environmental	Completed
Ecology	Bat Surveys	CSA Environmental	Underway- due to complete end of September
Ecology	Badger Survey	CSA Environmental	Completed
Ecology	Doormouse Survey	CSA Environmental	Underway- due to completed end of September
Ecology	Breeding Bird Survey	CSA Environmental	Completed
Ecology	Reptile Survey	CSA Environmental	Completed
Ecology	Great Crested Newt Survey	CSA Environmental	Completed
Arboriculture	Arboricultural Survey	CSA Environmental	Completed- issued reports
Archaeology and Heritage	Geophysical Survey	CgMs	Completed 2013
Archaeology and Heritage	Trial Trenching	CgMs	Proposed trial trenching plan agreed with archaeological advisor to LPA. Fieldwork costs and timeframes issued to client for approval and appointment in July 2016. Still awaiting confirmation of appointment and commencement of fieldwork
Noise and Vibration	Baseline Noise Survey	AcousticAir	Baseline noise and vibration surveys completed, and site assessments underway. Awaiting AAWT traffic data to assess traffic noise changes.
Air Quality	Air Quality Assessment	AcousticAir	Baseline air quality reviews completed. Awaiting AADT traffic data to assess local air quality impacts.
FRA and Drainage	Infiltration Tests	C & A Consulting	Completed for Surface Water & Flooding. Foul Drainage modelling to commence by Thames Water Utilities
Site Investigation	Stage 1 Site Investigation	C & A Consulting	Field Work Completed except on going Ground Water Monitoring over a 12mth period and Local area specific testing for detailed design.

Highways and Access	Transport Assessment	C & A Consulting	Scoped Count and Speed Surveys complete. Awaiting Paramics Model data from Hertfordshire to confirm distribution to Highway network
Utilities	Advice on Gas Pipeline	Hamer Associates	Awaiting update on pipeline characteristics from NG. LPA will consult PADHI+ software produced by HSE.
Education	Educational Needs Assessment	EFM	Work ongoing.
Socio-Economic	Social-Economic Impact Assessment	Savills	On-going as part of EIA work.
Planning	Planning Statement	Savills	On going. Waiting on technical input
Landscape	LVIA	Savills	Site visits and desk-based surveys have been undertaken. Baseline report currently being prepared.
Urban Design	DAS	Savills	Not yet started
Urban Design	Illustrative Masterplan and other Supporting Material	Savills	Draft illustrative masterplan and parameter plans prepared. Subject to further refinement following input from specialist surveys.