

DEF Response to Pre-Submission Core Strategy 2011 Nov 11: Extracts (black) with our responses in Green

1.4

An average of 430 new homes will be provided within the Borough each year, for the plan period (2006-2031). This equates to a total of 10,750 homes. The actual level of delivery is expected to be slightly higher, due to Government rules which do not allow assumptions to be made for 'windfall' sites for the whole plan period when setting the housing target.

This is **ineffective**, in that it runs contrary to other elements of the Strategy, namely:

1.17 "maintain the openness of the areas of the borough designated as Green Belt or Rural Area;"

1.18 "Maintaining the countryside helps to prevent towns and villages from merging into one another and ensures that they retain their distinctive characters. "

6.2 Strategic Objective 12 To protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment.

8.29 "A strategic review of Green Belt boundaries is not required, although some small-scale releases will be necessary to meet specific local needs or to correct minor anomalies. "

Policy CS2

"Extensions to defined settlements . . . must .. respect local character and landscape context;"

Policy CS5

"The strict application of national Green Belt policy which permits appropriate development will be used to protect openness, local distinctiveness and the physical separation of settlements.

No general review of the Green belt boundary is proposed, although local allocations (under Policies CS2 and CS3) will be permitted). "

27.11 "Flexibility within planning policies is necessary to enable . . . adaptation to changing national advice and planning policies;" (Large-scale releases of Green Belt land, a direct consequence of this level of housing growth are irreversible and therefore inflexible.)

See our response to 1.10, which spells out why, for example, the development at West Hemel Hempstead, which is necessitated by this level of growth, fails to meet the above-quoted environmental objectives.

For comparison, the options for annual averages given in the consultation on the Core Strategy of DBC's Local Development Framework in November 2010 were Option 1 (no Green Belt landtake): 370 and Option 2: 430.

Previously, the annual average figures affecting Dacorum and set out into the East of England Plan 2009 consultation were (2011-2031): 300 (Scenarios 1 and 2) and 620, 500 (Scenarios 4 and 5 respectively).

The majority of respondees to Dacorum Council's planning consultation in November 2010 favoured the lower growth figure of "Option 1" . It is disappointing, less than a year later, that the Council have chosen Option 2 for the pre-Submission stage, and that reportedly the Council leader doesn't believe that "Option 1 is something we could defend" - presumably from legal or procedural challenges which might argue that it was inconsistent with Government Policy. In our response to 14.7 we argue that this fear is unjustified, and that a lower growth figure is indeed consistent with Government policies.

1.10

Hemel Hempstead will be the Main Centre for Development and Change in the borough and the focus for new homes, jobs and infrastructure. This will include:

New homes. Around 8,800 new homes will be provided in the town. This includes Local Allocations at West Hemel Hempstead, Marchmont Farm and the Old Town. 35% of all new homes will normally be made available at affordable prices or rents.

This is **ineffective**, in that it runs contrary to other elements of the Strategy, as listed in our response to 1.4.

For example, the return to consideration of a West Hemel Hempstead development is disappointing, following decades when generations of planners have quite rightly ruled it out.

Although the current consultation documents do not appear to include a map defining it, the 2010 Core Strategy consultation document described "West Hemel Hempstead" as "between 450 (northern area only) and 900 new homes". The 450 are presumably those described by Taylor Wimpey UK Limited in their 2010 consultation response as "land within the ownership control of Taylor Wimpey" and identifiable from their map as land extending in the direction of Pouchen End Lane from the line of the footpath from near the Long Chaulden Adventure Playground to the top end of the existing Fields End estate.

Development of this area would block off one of the most valuable "Green Lungs" designed in the Master Plan for the creation of Hemel Hempstead.

It is bordered by the Local Nature Reserve of Shrubhill Common, for which it provides a valuable wildlife corridor. At the November '08 meeting of Friends of Shrubhill Common Martin Hicks of the Herts Biological Record Centre confirmed the findings of the Centre's 2006 Urban Study, commissioned by DBC, in saying that were development to occur, a corridor to the North/NW of the LNR at least as wide as the first field bounded by FP20 would be needed in order to maintain the viability of the LNR.

The area's footpaths and Pouchen End Lane currently provide a valuable and well used informal recreational amenity for Warners End, Chaulden and Fields End residents.

Development here would be highly visually intrusive across and along the Bulbourne valley. It was recommended against on landscape grounds by the Inspector into the Borough Plan in 2000 and before that by the Council's own planning consultants. In 2000 a 1500-strong petition of Chaulden and Warners End residents opposing the loss of Green Belt status was raised by Friends of Shrubhill Common and presented to the Council.

Development would also increase pressure for a Northern Bypass which would be of yet further substantial detriment visually and in terms of amenity.

In Section 1.4, Hemel Hempstead Local Allocation Assessment, of Appendix F of the accompanying Sustainability Appraisal Report "West Hemel Hempstead" achieves only three ticks out of 20 sustainability appraisal objectives, and of these three, one is because the development will provide social housing and the other two are little more than aspirations that, because of its size, it will attract new local facilities.

5.1 DACORUM 2031: A VISION

This includes: Carbon emissions have been reduced and renewable energy production is sensitive to its surroundings

This is not sufficiently **effective**, since there is no mention of the Global context.

The aspiration is laudable, but it is unrealistic not to include any reference to Global issues. For example, Dacorum residents contribute to global warming by their purchases of goods manufactured in China (see our response to 11.11 on low carbon technology) .

It is disappointing that there appears to be no reference to the Global context in the Core Strategy. This is in contrast to the public consultation document of November 2010, which contained:

"9.1 The Sustainable Development Strategy sets out the over-arching approach towards development within Dacorum.

9.2 Contributing to the achievement of sustainable development is a statutory objective of the planning system¹. The UK's Sustainable Development Strategy – Securing the Future (2005) has defined the goal of sustainable development as being:

"to enable all people through the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations."

A key component of global Sustainable Development is world population growth, which exacerbates the problems of scarcity of land and other resources and is on such a scale that UK migration policy, while being a key determinant in UK planning (see our response to 14.7), has a negligible global effect. Our Borough's vision should include its aspiration for a stabilised world population that is sustainable by the planet upon whose resources it depends.

In line with our suggested addition to Strategic Objectives (6.2), the following sentence should be inserted into the Vision:

"Most of our food is grown in and around Dacorum".

6.2. (strategic objectives include:)

- (1) To promote healthy and sustainable communities and a high quality of life for Dacorum.
- (4) To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel by car.
- (9) To promote a vibrant and prosperous economy:

This is not sufficiently **effective**, since two objectives are self-contradictory unless the strategy addresses the conflicting interests of developer/home improver and neighbouring residents.

We support the emphasis on access rather than transport, and the reduction in need to travel by car (Objective 4.) This implies a general presumption in favour of commonly needed facilities being provided locally, with good pedestrian access.

The unqualified aim of a "vibrant and prosperous economy" (Point 9) should be subject to ensuring the "high quality of life" of Point 1. The many black-economy home-based businesses and extended DIY activities of one section of the community are already detrimental to the quality of life for others in the neighbourhoods in which they occur.

Examples of this are:

Protracted house extension activity not involving the official use of contractors and therefore not currently subject to limits on working hours.

Use of pavements and verges for building waste and materials for extended periods of time, whether or not stored in skips.

Widespread use of stone cutters with no dust suppressant.

Aggravation of street and pavement parking nuisance through the use of commercial vehicles for journey to work and home-based businesses

The Strategy should encompass mechanisms for minimising these detriments to quality of life, which to too many residents are very real and of the utmost priority.

In particular, the word "vibrant", with its echoes of uncontrolled growth, with attendant noise and light pollution, should be replaced by "sustainable" here and anywhere else it is used in the Strategy.

The list should include an Objective concerning local food. We suggest:

"To support and encourage food to be grown, processed and sold locally, to meet most of the needs of the residents of Dacorum".

Although there is some mention of local food production under Section 26, Countryside Place Strategy, it is sufficiently important to be ranked here as a Strategic Objective.

9.3 (Transport) National policy is no longer aimed at catering for the unrestrained growth of road traffic. Travel demand needs to be managed in a way that is more sustainable and delivers carbon reductions. This approach includes:

- reducing the need to travel (by both car and non-car mode);
- managing existing road capacity;
- carefully locating development so that it is accessible to all users;
- controlling and managing new car parking spaces;
- encouraging fewer car journeys;
- promoting non-car travel; and
- implementing Green Travel Plans.

We support these objectives, but this is not sufficiently **effective**, since it omits policies on commonly occurring problems.

The principle of giving preference to pedestrians is welcome. However the above headings should be supplemented by further bullet points relating to combatting the following problems:

- Widespread pavement abuse through parking and protracted building maintenance.
- Working vehicles used for journey-to-work.
- Multiple household car ownership reliant on unregulated free-for-all on-street parking.

Control of new car parking spaces should be phased in around the other measures, in order to minimise the consequence of increasing roadway, verge and pavement parking.

9.11

Policy CS 8

Sustainable Transport

All new development will contribute to a well connected and accessible transport system whose principles are to:

- a. give priority to the needs of other road and passenger transport users over the private car in the following order:
 - pedestrians
 - cyclists
 - passenger transport (buses, trains and taxis)
 - powered two wheeled vehicles
 - other motor vehicles;

This is not sufficiently explicit to be **effective**. We welcome this prioritisation of transport modes. However the plan must contain a pledge not to cut existing bus services. There is also a strong case for a large increase in services, especially in villages. Bus services need to operate late in the evening over all parts of Dacorum, and there must be good bus services on Sundays. Bus services need to be cheap, frequent and safe. There should also be a rapid transition to cleaner fuels to be used in the operation of the buses eg Electric , Hybrid and L.P.G. See also our response to 9.3.

11.11

Hertfordshire's Economic Development Strategy aims to develop the potential for a specific low carbon technology cluster in the county across the 'energy and environmental goods and services' (EEGS). Businesses that are actively engaged in the design, manufacture, distribution, installation and maintenance of low carbon goods and services will be encouraged to locate within the borough. Technology will be a key part of the low carbon economy and it will be important for Dacorum's economy to take advantage of the latest low carbon technologies.

This is not sufficiently **effective**.

While supporting this, we suggest in addition "The planning system will give preferential treatment to repair and servicing enterprises, whose general effect is to prolong the life of consumer durables and hence to avoid wasting their embodied energy." (See <http://www.inference.phy.cam.ac.uk/mackay/> for an explanation of the term "embodied energy".)

11.17

Policy 14

Economic Development

Sufficient land will be allocated to accommodate growth in the economy of approximately 10,000 jobs between 2006 and 2031. Development that supports the knowledge-based economy, the transition to a low carbon economy, the rural economy and sustainable tourism, will be particularly encouraged.

This is not sufficiently **effective**. We need a sustainable economy that supports renewable technology and local production for local use. Employment should be well paid, with full workers' rights and recognition of trade unions. Every encouragement and support should be given for setting up co-operatives. There should be a mixture of manufacturing , farming , allotments and services. See our responses to 6.2 (local food) and 11.11 (Service and Repair industries)

14 Providing homes

Strategic Objectives

- To provide a mix of new homes to meet the needs of the population.
- To provide for a full range of social, leisure and community

This is not **justified**.

DEF believes that the housing requirements in the borough are substantially over estimated. This can be evidenced in the following ways.

The 2003 Housing Needs Survey for the current period identified that there was an annual need of affordable housing of 710 new homes per annum. However, the supply of all housing (including private and affordable housing) for the period April 2001 to March 2010 was 3,225 (322 new homes per year) (source, Housing Land Availability Paper - Dacorum 2011).

Therefore the amount of housing being provided in the District was less than half that claimed as required by the 2003 Housing Needs survey for affordable housing only.

Despite the substantial shortfall in housing supply, the waiting list for the District remained broadly stable over the decade. E.g. during the period 1997 to 2006 the figure of households on the Council's waiting list varied from a high of 3,465 in 2003 to a low of 2,398 in 2006. The Council will point to an increase on the waiting list from 2007 to 2009 from 4,413 to 5,374. These increases are explained by the Department of Communities and Local Government (DCLG) Statistics' own data as being caused by the introduction of choice based lettings, which increased the number of households on the list, including those previously under-represented, e.g. those in employment. The DCLG data also refers to households remaining

on the list after they have been housed, and the removal of the statutory duty on local authorities to update their waiting lists. In other words, the way that data has been collected since 2006 has changed, and the increases shown cannot be relied upon to reflect any true increase in housing demand.

Another way of measuring housing demand is by looking at the number of households accepted by a local authority as statutorily homeless, and the number of households in temporary accommodation. DEF suggest that a genuine increase in the size of the waiting list would be expected to be accompanied by an increase in the number of households being accepted as statutorily homeless by the Borough. DCLG data for Dacorum for the period of 2004-2001 appears to show a different story. Households accepted as statutorily homeless in Dacorum over the whole of this period were 419 (an average of 57 per year over this period. However, the numbers of statutorily homeless households accepted by the Borough over the last 3 years, when according to their figures the waiting list has been increasing, was 76 (an average of 25 per year).

To conclude: the examples provided above of data for recent supply against predicted demand shows that, despite a substantial claimed under-supply of housing in Dacorum, there was no material evidence of a housing shortage, and that this fact is supported by the very small numbers being accepted in Dacorum as statutorily homeless. We therefore believe that there is good evidence to show that the methods used for measuring future housing demand are flawed and should be robustly reviewed before the numbers of homes required are fixed at the levels proposed. From our review of current demand and supply, we believe that the methods currently used to predict future housing demand would lead to a substantial over-supply of housing in the area.

14.7

Demand and need for housing has been assessed through the London Commuter Belt (West) Strategic Housing Market Assessment (SHMA) 2010 (covering six Hertfordshire authorities, including Dacorum).

This is **unjustified**, since the housing demand figures, based on the regional Strategic Housing Market Assessment (SHMA), are unsound.

The Executive Summary of SHMA is referenced from the DBC planning portal under the heading "Strategic Housing Market Assessment (SHMA) April 2010", though the heading within the executive summary document itself is still "Strategic Housing Market Assessment 2008 " and is prefaced with these significant caveats:

"i. This study was undertaken in 2008/9. The reference point for the analysis was up to the end of March 2008 as this ensured that all data sources could be reconciled to the same baseline date. The modelling projections produced relate to the period April 2007 to March 2021.

ii. There have been significant changes since the start of this study, including the impacts of the recession on the housing market and, in 2009, the legal challenge to the East of England Plan. It was not possible to fully calibrate the results of this study to take full account of such factors given that many secondary data sources are yet to reflect these and other more recent changes.

iv. It is not yet clear what impact the economic downturn may have on international migration but the number and nature of migrants from overseas is an important factor in determining the overall requirement for housing across the LCB (West). If net international migration falls, the overall housing requirement is also likely to reduce. "

The last sentence, coupled with the current Government's stated policy of capping non-EU net inward migration, is a clear indication that government policy should have resulted in a reduction and not an increase in the target figure over the last two years, whereas in fact the

lower growth options have been progressively withdrawn in the consultations that have taken place since 2009, as we summarise in our response to Section 1.4.

The discrepancy in planning period (SHMA to 2021, Core Strategy to 2031) also detract from the soundness of the current 430 per annum figure.

Average house occupancy is another key factor in arriving at housing targets. Since these targets take into account planning permissions already granted, the considerable number of house extensions that have taken place in Dacorum in recent years should also be allowed for. Most extensions result in extra bedrooms and sometimes extra bathrooms, and therefore facilitate higher occupancy levels. Extensions typically take up former garden space, and thereby deplete a recognised and important habitat resource for the promotion of biodiversity, so it is perfectly appropriate in Green Accounting terms for this to be offset by a reduction in the allocation of new greenfield sites for further development.

No irrevocable planning decisions, in particular any resulting in loss of Green Belt, should result from over-provision for international migration or any other factor.

14.23 Policy CS 17

New Housing

An average of 430 net additional dwellings will be provided each year (between 2006 and 2031).

This is **ineffective**, in that it runs contrary to other elements of the Strategy, as listed in our response to 1.4. New housing should only be built on brownfield sites. If the council had gone for the lower option, 7000 houses would all have been built on brownfield sites. Under the higher option 1550 will be built on greenbelt land, leaving the remainder to be built on brownfield sites. It is ridiculous to sacrifice greenbelt land for 1550 homes. plus the infrastructure needed. (See for example our response to 1.10.) We also raise the issue of how many houses are empty in Dacorum., and how many are actually homeless in Dacorum. (See our response to Section 14 header.)

15.25 New opportunities for heritage, arts and cultural businesses and links between local schools and communities will also be supported, particularly as part of mixed use developments and regeneration schemes.

Policy CS 23

Social infrastructure, providing services and facilities to the community, will be encouraged. New infrastructure will:

- be located to aid accessibility; and
- provide for the multifunctional use of space.
- The dual use of new and existing facilities will be promoted.
- The provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt. Zones will be defined in the Green Belt where there is clear evidence of need: the effect of new building and activity on the countryside must, however, be minimised.

This is not sufficiently **effective**. Regarding school facilities, there is clear evidence that school children are having to travel from Berkhamsted to Gadebridge, Potten End and Tring. This pressure will only increase if the higher housing numbers take place. That is why a lower figure would have been more sustainable. Hertfordshire County Council has a legal obligation to make sure that every child has a school place. Can this be guaranteed under this plan? See also our response to 1.4.

Planning constraints on schools in the Green Belt should be no less robust than those for housing. Considerations should include visual intrusion, school run traffic and light pollution.

Multiple use constraints on the specification of a performing arts centre should not be at the expense of providing facilities equivalent to the Milton Keynes theatre, which is able to attract national touring companies such as Glyndebourne.

18.42

Policy CS 31

Water Management

Water will be retained in the natural environment as far as possible. Measures to restore natural flows in the river systems and the water environment will be supported. Supply to the Grand Union Canal will be maintained.

Development will be required to:

- a. avoid Flood Zones 2 and 3 unless it is for a compatible use: Flood Risk Assessments must accompany planning applications for development in these areas, explaining how the sequential approach to development has been taken into account and outlining appropriate mitigation measures;
- b. minimise water runoff;
- c. secure opportunities to reduce the cause and impact of flooding, such as using green infrastructure for flood storage;
- d. secure opportunities to conserve and enhance biodiversity; and
- e. avoid damage to Groundwater Source Protection Zones.

These aspirations are welcome but **ineffective** since they cannot be guaranteed given the main growth targets of the plan. See our response to **Policy CS 32**.

Policy CS 32

Air, Soil and Water Quality

Development will be required to help:

- a. support improvements in identified Air Quality Management Areas and maintain air quality standards throughout the area;
- b. maintain soil quality standards and remediate contaminated land in line with Environment Agency, DEFRA and Natural England guidance; and
- c. improve water quality standards in line with the Water Framework Directive, Environment Agency and Natural England guidance.

These aspirations are welcome but **ineffective** since they cannot be guaranteed given the main growth targets of the plan. See also our response to 1.4.

The Sustainability Appraisal Report (**Table 4-3: Compatibility of SA/SEA and Core Strategy Objectives**) states clearly that as a result of the proposed levels of housing and economic growth a number of adverse and uncertain effects have been identified. There will be increases in level of land take which could have localised adverse effects on environmental factors such as biodiversity, soils, landscape and townscape. There are also likely to be increases in the level of water abstraction, which in an area already identified as "over abstracted" could be a more significant issue over time. Housing development will result in an increase in greenhouse gas emissions from energy used in new housing and associated activities.