

**Dacorum Borough Council - Site Allocations – Written Representations**

**Submitted on Behalf of Whiteacre Ltd (Respondent ID 743858)**

**September 2016**

**Matter 4 – Housing**

**Question One: Overall Amount of Housing Provision..**

1. Our detailed knowledge of this aspect relates exclusively to Bovingdon, in which our direct interests lie, and that evidence will be covered in a different session. Nonetheless it is clear that in the case of Bovingdon. The housing allocation is not consistent with the contents of the Core Strategy, for reasons which are set out in detail in our representation to matter 12.
2. There is an insufficient amount of housing land allocated in the Site Allocations put forward by the council, since the combined total number of dwellings which the council estimates will be delivered from the 6 allocated sites is only between 1,560 to 1,630. This equates to only two years' worth of the required housing OAN published in the council's SHLAA. Self-evidently, many more sites must be allocated to make meet the council's OAN for the plan period.
3. Even if the council's proposals are intended to only address the first 5 years of OAN (which falls seriously short of the full plan period) then the 6 allocated sites only amount to around 40% of what is required in that 5 year period. A Site Allocations document comprising sites of just 2 years' worth of housing need is wholly inadequate, fundamentally unsound, and can only be remedied by allocating many more sites for residential development.
4. Not only should the number of dwellings from allocated sites be greater, by allocating more sites; but they should also not be artificially delayed.
5. The council has received promotions for many alternative sites which have been found to be 'developable and deliverable', by the council's own SHLA assessment. The SHLA shows that all of those sites should come forward to meet the OAN, yet none of those sites are considered as alternatives in the council's Site Allocations document.
6. While we cannot comment in detail on the way in which the council has arrived at the actual number of dwellings for each site (as raised in this question by the Inspector); we can confidently state that the council continues to significantly over-estimate the number of dwellings which can be delivered from site LA6, as we highlight in detail in our representation relation to matter 12.

## **Question Two: Green Belt Review**

1. It seems to us that the Site Allocations stage of the plan-making process cannot logically be carried out before the Green Belt (GB) review has taken place. To attempt to do so is not only irrational but inherently unsound. To remedy this point, the GB review should be completed and published, allowing the Site Allocations process to reflect that very important component.
2. This is especially important since all of the 6 allocated sites are land releases from the GB. We question whether there can be any confidence in whether these are the right GB sites to be taken out of the GB and allocated for development, when there simply hasn't been a proper review of the GB, which may well result in other sites being found more suitable for development.
3. At this stage it appears that the allocation of 6 sites to be released from the GB is a hurriedly applied (but wholly inadequate) sticking plaster, to give the impression that the council has a sound plan, and thus to avoid the conclusion that there is no satisfactory plan in place; with the consequent implications for the council's ability to resist housing proposals which do not comply with its plan. That course of action is clearly not good forward-thinking plan making, and should not be found to be acceptable, or sound.
4. We are informed that the Stage Two GB Review has been provided to the council by the consultants from whom it was commissioned many weeks ago. The council has not given any explanation for its failure to make that document public. It appears to have sought to suppress that key piece of evidence. The review would be of huge importance to the Inspector and all other participants in the Site Allocations process. Its suppression renders the SA stage somewhat incomplete, and thus unsound.
5. The publication of the GB review before continuing beyond the CS stage of plan-making would be consistent not only with central government advice, but also with the findings of the Inspector at the Core Strategy stage, the early partial review he required and with the high court judgement handed down in relation to a subsequent legal challenge. Dacorum's illogical approach is out of sequence with all four of those reference points and thus wholly unsound.
6. The SA stage of the plan making process should be delayed until the GB review has been published and digested by those involved. Site Allocations should be judged against the GB review, in order that a sound approach to allocating sites has been taken, many of which are within the GB.
7. Incidentally, the GB review is only one element of the work required to complete the early partial review required by the Inspector at the CS stage. We are not aware that the council has completed the other elements either. In order to comply with the process established in the CS, and therefore to be sound, surely the Site Allocations process should follow the early partial review, and not pre-empt it.

### **Question Three: Supply of Housing and Constrained Release**

1. We comment in detail on the council's approach to the supply of housing within our representations under Matter 6. Those comments essentially highlight that the council is not allocating enough sites to meet its SHLAA assessed OAN.
2. Against that backdrop, we cannot see any justification for holding sites back artificially. There has been a persistent failure on the part of the council in the last few years to ensure the delivery of even half of the housing which has been shown to be required. This has resulted in a significant backlog of unmet housing demand. There can be no sound justification for constraining housing land supply even further. Those constraints must be removed, in order to be sound.
3. The council's haphazard approach to plan making and its serial failure to provide enough housing land appear to indicate an all-pervading constraint-led approach, which has resulted in a failure to acknowledge, yet alone discharge, its essential responsibility to provide enough new housing in the Borough. We can see no justifiable rationale for imposing artificial constraints on the release of housing land, and will be very interested to hear the council's rationale at the session for this matter.

#### **Question Four: Delivery of Committed Sites and Account of Windfalls.**

1. Notwithstanding comments made above, about the fact that the allocated sites make up only two years of OAN housing need, there can be no guarantee that all of those sites will deliver the urgently needed homes within the plan period.
2. In order to be sound, by reference to the OAN for housing, those sites would have to deliver all of their housing within just two years. That would assume a delivery rate of 133 homes per site per year, and all of them starting immediately (even though planning consents are not yet in place). Clearly those assumptions are wildly over-optimistic and thus wholly unsound.
3. Furthermore, within our evidence relating to question three within matter 6, we show that the council must allocate all 103 sites which are 'deliverable or developable' in its SHLAA. It estimates the total housing capacity from these sites to be 11,926 over a 15 year period. That number would only be reached if all available sites are fully developed in the 15 year plan period.
4. With regard to windfalls, table 4.2 of the SHLAA shows that the council has delivered only around 91 dwellings per annum from windfall sites in the period 2006 to 2013. Against an OAN of 756 dwellings per annum, this is clearly only a fraction of overall need (just 12%) and therefore cannot be relied upon as a means by which the council could allocate such a low proportion of its housing from allocated sites. It would simply not be sound to place any significant reliance on the emergence of windfall sites to address the huge shortfall in allocated sites.

### **Question Five: AMR, Housing Completions and Shortfall**

1. The most obvious explanation for the council's persistent shortfall in delivering new housing is that it simply is not issuing planning permissions at a satisfactory rate. Our experience with the council is that they are resistant to the granting of planning permissions for available sites which could deliver housing very quickly and in sustainable locations. This is largely due to an adherence to an inadequate and outdated plan, which itself fails to deliver housing land. There needs to be a fundamental shift in the council's approach and a much more sustained and coherent intent to allocate and deliver housing sites, if this shortfall is ever to be remedied.
2. Part of the obstacle to resisting new housing sites on a satisfactory scale relates to the council's failure to grasp and address the need to release GB sites, from which inevitably much of its housing land will have to come. Other neighbouring councils (Aylesbury Vale for example) have gone through that essential adjustment and are now set to deliver significant new housing from sites which it had historically resisted. Dacorum have yet to confront that reality. The issues highlighted by the Inspector in question 5 will continue, until it does.
3. The council must allocate more sites, publish the GB review and show how it will deliver the required amount of housing required to meet the published OAN, in order to be sound, and in order to deliver what the SHMA now shows the residents of Dacorum so badly need.

## **Question Seven: Deleted Sites and Replacement Sites**

1. The council has not only allocated only a fraction of the sites it needs, it has made no provision for alternatives and places reliance on all of them being delivered. That approach is clearly fundamentally unsound. Far from putting forward other sites, the council is actively resisting them.
2. Furthermore, the council's approach to the public consultation part of the SA process was to suppress all representations which related to alternative sites promoted by others. No information was made publically available in relation to alternative sites put forward in the council's call for sites. Information was only made available in relation to sites LA1 to LA6, highlighting the pre-determined 'fait accompli' approach taken by the council.
3. We, amongst many others, have tried to put forward other sites both at the CS stage and the SA stage. Those representations have not been met with any meaningful response or engagement by the council.
4. In order to try and break that impasse and engage with the council, we have recently conducted a very comprehensive (and expensive) pre-application consultation for the site which we are promoting. That has resulted in an acknowledgement by the council that our site is deliverable and free from constraints, but the overall approach is to adhere steadfastly to the out-of-date plan, and to resist the release of the site, simply because it is not one of the 6 allocated sites.
5. This situation has persisted in the face of two pre-app meetings and submitted evidence to show that site LA6 is not compliant with the CS for a range of undisputed reasons. Yet the council shows no signs of changing its pre-determined path and thus an alternative and available continues to lie undeveloped. We suspect this situation is repeated throughout the Borough. If the plan-making was focussed on delivery and not restraint then this would not be happening. The plan is unsound and site allocations are insufficient. To become sound the plan must identify a much greater supply of housing sites and the council must pro-actively engage with promoters, rather than ignoring them and suppressing their representations; in order that the plan will then achieve its intended objective of delivering housing to meet the unmet OAN.