

# NMB PLANNING

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**Dacorum Borough Council Site Allocations DPD Examination in Public**

Response to questions in Inspector's Matter 2: General Matters

On behalf of Crest Nicholson (landholding at Red Lion Lane, Hemel Hempstead)

September 2016

### Context for response

- 1.1 This response has been prepared by NMB Planning on behalf of Crest Nicholson, whom together with Linden Homes, own land south of Red Lion Lane, Hemel Hempstead, which is within the land area covered by draft Policy SA10: Education Zones in the submitted Dacorum Site Allocations DPD.
- 1.2 Crest Nicholson has responded to earlier consultations regarding the Site Allocations DPD, most recently the Proposed Focused Changes consultation which took place in September 2015.
- 1.3 Crest Nicholson are active house builders in the Borough, with the residential-led redevelopment of a former industrial site on the northern side of Red Lion Lane, Hemel Hempstead ongoing.
- 1.4 A remnant part of the redeveloped site is identified as a potential education site within Education Zone EZ/1: Nash Mills in Policy SA10 of the submitted Site Allocations DPD. The site is under the ownership of Crest Nicholson. Whilst Crest is supportive of the inclusion of the site for potential educational use, it is actively promoting the site as being more suitable for residential development. It is in this context that we respond to the relevant matters and questions raised by the Inspector ahead of the Site Allocations DPD Examination in Public.
- 1.5 Responses have been prepared to questions in Matter 2, 4 and 6.

### Question 5: What alternatives to the sites in the Plan have been considered?

- 2.1 In our view, the Council has not considered sufficiently the alternative sites which have been put forward as opportunities for housing delivery. In respect of the site at Red Lion Lane, Hemel Hempstead; the Council has identified this site independently for educational purposes, however its suitability for residential use has not been considered fully.

### Question 16. Is the evidence base relating to such matters as housing, employment, retail, and flood risk up-to-date and relevant?

- 3.1 We do not consider that the Council has submitted the most up to date evidence on their housing supply and delivery. The Housing Land Position Statement (document HG1) is dated April 2015 and is therefore over a year out of date. It is our view that

an updated Statement should be submitted to the Examination in order to provide clarity as to the current position in respect of housing land.

- 3.2 In the Site Allocations DPD, Table 3 which sets out the Housing Programme refers to the AMR April 2015. An updated version for 2016 should be available for the Examination and the figures in Table 3 should be updated accordingly.

Question 17. Are there any important developments/changes since the submission of the Plan, for instance in terms of planning permissions/completions? Is the SHLAA and SHMA up-to-date and robust?

- 4.1 The Strategic Housing Land Availability Assessment (SHLAA; document HG13) has a date of 2008, which means that the data within it is even older. We are aware that the Council is updating its SHLAA as we submitted a response to the consultation which took place in March 2015, however it does not appear that the updated information has been passed onto the Inspector. It is our view that in order for the Site Allocations DPD to be found sound, it should be based on the most up to date evidence available.