



Dacorum Borough Council
Core Strategy
Examination in Public

Issue 6: Providing Homes

Statement prepared on behalf of

The E.J Hillier Will Trust

and

Whiteacre Ltd

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by

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Dacorum Borough Council Core Strategy Examination in Public September/October 2012

Issue 6: Providing Homes

1.0 Introduction

1.1 These representations are made by Hives Planning Ltd, in respect of land at Grange Farm, Bovingdon. Representations to previous stages of the Core Strategy have been submitted by Hives on behalf of the E.J. Hillier Will Trust, who are now promoting the site together with Whiteacre Ltd.

2.0 Issue 6.4

Is the overall housing provision based on a sound assessment of supply and demand? In particular:

a) will the Core Strategy meet the full objectively assessed needs for market and affordable housing in the Borough?

2.1 We contend that the provision for housing made in Policy CS17 (10,750, or 430 pa) is inadequate and does not reflect the evidenced needs of the Borough. The Core Strategy therefore fails to accord with paragraph 47 of the NPPF and, being contrary to this, fails the tests of soundness set out at paragraph 182 of the NPPF.

2.2 The figure of 430 dwellings per annum (dpa) represents the Council's 'middle option' as assessed in the Background Paper 'Selecting the Core Strategy Housing Target'. However, this fails to deliver sufficient housing to meet local need based on projected population increases (i.e. the CLG-published household projections) – these vary between 496 dpa (2006-based household projections) and 540 dpa (2008-based household projections)¹. Indeed, the Council's own assessment of its housing need acknowledges that "the Council should be planning for around 13,500 dwellings if it is to meet full projected demand and levels of in-migration in the Borough (i.e. 540 dwellings per annum)"².

2.3 The Core Strategy must meet this identified need if it is to comply with the requirements of the NPPF and deliver sustainable development. The consequences of not meeting this need are that economic growth will be frustrated, and that the Borough will not be able to accommodate even natural population increase, leading

¹ Table 3.7, DBC Background Paper 'Selecting the Core Strategy Housing Target'

² Para 3.5, DBC Background Paper 'Selecting the Core Strategy Housing Target'

to higher house prices (and decreasing affordability). This would not result in sustainable development.

- 2.4 It is noted that the use of the 2006-based and 2008-based household projections only provide for the housing needs of Dacorum Borough; it does not provide for any sub-regional apportionment of growth. This was previously considered through the East of England Plan, which required some 600 dwellings to be delivered in the Borough each year, and regard should be had to this level of growth which was assessed as being necessary. For this reason, utilisation of the household projections as a basis for the overall housing target is considered to represent an inadequate estimate of need and the higher estimate should therefore be adopted in the Core Strategy (i.e. at least 540 dpa or 13,500 dwellings over the plan period).
- 2.5 Clearly, increasing the overall amount of housing required in the Borough will better help to deliver affordable housing (as the key mechanism for delivery of affordable housing will be through new development under Policy CS19). Indeed, the Council acknowledges that a total housing allocation of 10,750 dwellings is only likely to deliver 3,300 affordable dwellings, whereas the need in the Borough is acknowledged to be 5,525³.
- 2.6 In summary, the Core Strategy as drafted is not sound because it does not meet the “full, objectively assessed needs” of the Borough (paragraph 47 of the NPPF). In order to be found sound, Policy CS17 needs to be amended to provide for at least 540 dwellings per annum, or a total of 13,500 over the plan period. This approach would provide for the Borough’s own needs but would still not meet any degree of sub-regional apportionment, as was envisaged in the East of England Plan. It would also assist in providing much-needed affordable housing in the Borough. The Council acknowledges these benefits; but do not present any compelling evidence to demonstrate that this higher level of growth cannot be accommodated. In the absence of such evidence, which is required by paragraph 14 of the NPPF, the Core Strategy cannot be found sound unless the total housing allocation for the Borough is increased to 13,500 dwellings.

3.0 Conclusions

- 3.1 Policy CS17 of the Core Strategy does not plan for sufficient housing in the Borough in the plan period and therefore fails to deliver sustainable development. The Council

³ Paragraphs 3.34 and 3.31, DBC Background Paper ‘Selecting the Core Strategy Housing Target’

have not demonstrated that there would be any adverse impacts of meeting their objectively assessed housing needs – as such, paragraph 14 of the NPPF requires the Council to plan for these needs in full. As such, the Strategy also fails to “boost significantly the supply of housing” and does not “meet the full, objectively assessed needs for market and affordable housing”, contrary to paragraph 47 of the NPPF.

- 3.2 As a result of the above, Policy CS17 fails all the tests of soundness set out at paragraph 182 of the NPPF: it is not positively prepared, justified or effective and is not consistent with national policy. In order to address these shortcomings, the Policy should be amended to provide for a minimum of 13,500 dwellings over the plan period (or 540 dwellings per annum).