

# Dacorum Borough Council Core Strategy Examination in Public 2012

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AMEC on behalf of Trustees of Piers Williams (ID: 502504)

Hearing Session and Issue: Thursday 11<sup>th</sup> October, 10.00, Issue 6

## WRITTEN SUBMISSION

### Context

This Written Representation is in response to questions raised by the Inspector which are considered relevant to our client's interests under Issue 6, questions 6.1, 6.4 and 6.5.

### Issue 6 Questions

*Question 6.1 Are the housing policies consistent with national guidance and supported by clear and robust evidence? Is the identification of strategic sites and local allocations appropriate and is the status of the SS and LA policies clear? There are no local allocations or strategic sites included in the Place Strategies for Kings Langley or the Countryside. Is this a satisfactory approach to take? How will the Council assess planning applications for development in these locations?*

It is considered that Policy CS17 (housing) is unsound as it is not consistent with national guidance and is not supported by clear and robust evidence. It therefore fails the tests of justified and consistency with national policy.

The emphasis of NPPF is to ensure local plans are positively prepared (paragraph 182) and significantly boost housing supply (paragraph 47). This also requires local planning authorities to identify a specific supply of developable sites or broad locations for year 6-10 and, where possible, for years 11-15 and update this annually. In addition, local plans should be sufficiently flexible to adapt to rapid changes (paragraph 14).

Paragraph 158 of NPPF requires that Local Plans are prepared on the basis of an 'adequate, up-to-date, and relevant evidence base about the economic, social and environmental characteristics and prospects of the area.' Paragraph 47 also requires council's to provide for "full, objectively assessed needs for market and affordable housing in the housing market area" something which the Core Strategy fails to achieve. In addition the policy is not sufficiently flexible in line with the emphasis of NPPF as outlined above. Accordingly, the Core Strategy should positively respond to meeting housing needs in the area.

However, the Core Strategy is planning to provide a lower level of growth (430 dwellings per annum) than evidence on housing need and household projections indicate might be required as outlined below:

- **Housing need:** The London Commuter Belt (West) SHMA published in 2008 indicates a requirement for 3,100 social rented homes in the period 2007-2021 (this equates to 221 dwellings per annum). The Council's updated SHMA<sup>1</sup> also identifies that the affordable requirement is higher than the level identified in the London Commuter Belt (West) and estimates an annual need for 557 affordable dwellings per annum. Policy CS19 of the Core Strategy only requires 35% of new dwellings to be affordable. The proposed rate of growth would only deliver 150 affordable dwellings per annum, and therefore would not adequately tackle the identified need.
- **Household projections:** The latest household projections were published in November 2010. The projections for Dacorum show that from 2008 to 2033 (a similar timescale to the Core Strategy), there is likely to be an increase of 13,000 households from 58,000 in 2008 to 71,000 in 2033, an increase of 22%. This equates to around 520 dwellings per annum, a significantly higher level than the 430 dwellings per annum proposed in the Pre-Submission Core Strategy.

The Council has sought to discount higher growth rates in a housing target paper published in June 2012<sup>2</sup>. The Council argues that 2008-based projections (540 dpa) are likely to be an overestimate of demand given their disagreement with assumptions regarding levels of immigration. However, regardless of whether or not these assumptions are correct, the SHMA still shows a level of affordable demand commensurate with the 2008-based projections (557 dpa). Together, there is weight of evidence to show that the objectively assessed housing need is far in excess of what the Council is planning for in Policy CS17.

Paragraph 182 sets out the four tests for soundness against which local plans will be assessed. This includes the tests of 'positively prepared' and 'effective'. The policy currently fails these tests. In order for the plan to meet these tests it should provide a responsive and flexible supply of housing to maintain housing delivery in line with other parts of NPPF and enable land to be brought forward quickly, something the current Strategy fails to achieve. In addition, NPPF (paragraph 157) states that:

*“Crucially, Local Plans should: ...be drawn up over an appropriate time scale, preferably a 15 year time horizon, take account of longer term requirements, and be kept up to date...”*

To make the Core Strategy sound in this regard it needs to allocate additional sites and make it clear that sustainable development (development in the right location, responding to needs and supporting the vitality of communities) will be supported. We consider that our client's land in Tring (see our response to Issue 12) is well placed to assist in housing delivery, particularly should other sites not come forward early.

Allocating additional land for development is also consistent with the call to significantly boost housing delivery as required by paragraph 47 of NPPF. The guidance also calls on LPAs to ensure performance is within an acceptable range (20% of the planned supply).

This approach would also be consistent with the presumption in favour of sustainable development set out in NPPF (paragraph 14). In addition, Paragraph 15 requires local planning authorities to include policies which “*follow the presumption in favour of sustainable*

<sup>1</sup> DBC Housing Market and Needs Assessment 2012

<sup>2</sup> DBC Selecting the Core Strategy Housing Target (June 2012)

*development so that it is clear that development which is sustainable can be approved without delay” (emphasis added).*

***Question 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?***

The Core Strategy is unsound because it will clearly not meet the full objectively assessed needs for market and affordable housing in the Borough. See response to question 6.1 above.

***(e) is there sufficient flexibility to deal with changing circumstances affecting phasing and delivery – in particular with regard to the economy and financial constraints, land ownership and infrastructure provision?***

The plan is considered unsound in this respect as the under provision of housing and the low target will not provide sufficient flexibility to adapt to rapid changes (in line with the requirement of NPPF, paragraph 14). See response to question 6.1 above.

***Question 6.5 Bearing in mind the significant need for housing in the Borough, why was the higher growth option discounted?***

It is not considered that the Council’s reasons for discounting a higher rate of growth as outlined in the housing paper to support the EiP<sup>3</sup>, hold up to scrutiny

The Council’s overall approach was to consider a ‘demand-led scenario’ of 500 dpa, (which they have discounted). The reasons for discounting higher options are unjustified for the reasons outlined below:

- The Council’s justification for planning for a reduced figure is that *“Difficult policy decisions would need to be made in order to bring forward additional housing land under the demand-led scenario, either affecting the strategy at particular places (and the character and infrastructure at these settlements), or requiring acceptance of growth by another authority.”*

*We would argue that these difficult decisions need to be made now and not postponed for the future.*

- Other justifications for reducing the housing numbers include the impact on the Green Belt.

*Without a Green Belt review it is not possible to make this assertion (see our response to Issue 2).*

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<sup>3</sup> DBC Selecting the Core Strategy Housing Target (June 2012)

## Summary to question 6

### What part of the Core Strategy is unsound?

The Core Strategy is unsound because it will clearly not meet the full objectively assessed needs for market and affordable housing in the Borough and is therefore not in compliance with the requirements of NPPF.

### Which test of soundness it fails?

It is considered that the Core Strategy fails the tests of justified, effective and consistency with national guidance.

### Why it fails

The Council's proposed rate of housing growth fails these tests as it is not justified in relation to the evidence base. It will not be effective in meeting identified housing needs and is not consistent with NPPF in terms of significantly boosting housing supply.

### The precise change and/or wording sought

In order to be found sound the Core Strategy will need to give consideration to a higher rate of growth which enables the Council to more positively respond to housing needs in the Borough.

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