

# **Non Participant Statement: Issue 7**

## **Affordable Housing and Gypsies and Travellers**

### **Grand Union Investments and Dacorum Borough Council**

*September 2012*

# Issue 7: Affordable Housing and Gypsies and Travellers

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**Question 7.1: There is a significant need for affordable housing in the Borough (5,300 dwellings over the plan period) but this will not be met. Has sufficient weight been attached to addressing this issue?**

- 1) The comments below seek largely to review information and evidence produced since the representation submitted on the pre-submission Core Strategy (CS) in December 2011.
- 2) The NPPF (47 and 50) requires Local Plans to meet the full, objectively assessed needs for market and affordable housing, based on robust evidence.
- 3) A strategic SHMA was produced in 2010 on behalf of DBC and other local authorities covering the western London commuter belt. It was based on the RSS period up to 2021 and therefore targets were expressed in terms of the need between 2007 and 2021. These can however be factored to cover the Core Strategy period from 2006 to 2031.
- 4) At that time, the SHMA 2010 concluded that Dacorum should have a total housing requirement of 7,800 additional dwellings (557 dwellings per annum), of which 3,100 dwellings were affordable (221 dwellings per annum), between 2007 and 2021. Factored to cover the Core Strategy period, this equates to an additional 13,925 dwellings, of which 5,525 dwellings would be affordable.
- 5) Despite the evidence in the SHMA 2010, the emerging Core Strategy Policy CS19 states that 35% of all new dwellings should be affordable, which, based on the total target of 10,750 additional dwellings set out in Policy CS17, equates to a requirement of 3,763 affordable dwellings (151 affordable dwellings per annum). Therefore, the emerging Core Strategy only makes provision for 68.1% of the objectively assessed affordable housing need, leaving a deficit of 1,762 affordable dwellings over the Core Strategy period to 2031.
- 6) Furthermore, since submitting the Core Strategy to the Planning Inspectorate, DBC has published a 'Housing Needs and Market Assessment Update – Final Report 2012' (July 2012), which has been produced by consultants DCA.
- 7) It, importantly, identifies that the Borough's affordable housing need before new delivery is 730 units per annum. This equates to a need for 13,870 affordable dwellings over the remaining 19

years of the CS Plan period. If the affordable housing target of 35% of the 430 dwelling per annum CS target is achieved, this would see the delivery of only 2,860 affordable dwellings over the remaining 19 years of the CS Plan period. This equates to a significant affordable housing shortfall of 11,010 dwellings over the remaining 19 years of the Plan period or 580 dwellings per annum (as acknowledged at Paragraph 7.5.10 of the Housing Needs and Market Assessment Update).

- 8) DBC's approach completely disregards this significant shortfall and is therefore contrary to the NPPF (50 and 159). No weight has been attached to this issue. We ask the Inspector to advise on an appropriate recommendation to address this.
- 9) It is also important that DBC have, within draft CS19, enough flexibility built into draft policy to ensure that the required levels of affordable housing and tenure mix are as flexible as possible, following assessment on a site by site basis, to ensure viability of schemes are not stifled. There should also be recognition of those strategic developments which deliver other benefits beyond affordable housing in the negotiation of affordable homes as part of the application scheme.
- 10) The CS Plan's housing policies are found:
  - Not positively prepared
  - Not effective
  - Unjustified
  - Not consistent with the NPPF