

Berkhamsted Residents' Action Group

**Statements
to the
Independent Examination
into
Dacorum Borough Council
Core Strategy**

18 September 2012

Issue 6: Providing Homes

This is an important area when considering the soundness of the Core Strategy as some land owners are arguing that DBC have underestimated the housing target for the borough as whole and in particular where their parcels of land are situated.

First of all it is important to acknowledge that most of these land owners have no desire to formulate a coherent and balanced strategy, but are simply focused on maximising their profits. They continue to lobby the Government to insist on a purely demand led (rather than need) and economic strategy when it comes to planning and housing growth in the UK. But this is a totally unsustainable model that will ultimately let down current and future generations.

BRAG accepts that DBC are in a difficult position in providing a strategy that will accommodate the necessary growth in the region while preserving and protecting the environmental characteristics of the various settlements.

While not totally agreeing with the final housing target for Berkhamsted, BRAG believes that the “Background Paper – Selecting the Core Strategy Housing Target” is a robust document that offers proof that DBC’s housing targets are based on a solid foundation.

DBC have demonstrated that they have reviewed and analysed various growth scenarios based on different models. They correctly point out that these projections are just that - projections and not indisputable fact.

Developers would like everything to be demand led and manipulate population projections to support their needs. And then claim them as fact – they are not.

The Census when published is the only snap shot of fact and ONS make it clear that their projections are based on past trends and cannot take into account effects of policies. This is an exceptionally important point when considering local housing needs rather than regional or national.

For example, if there are many job vacancies in a town it is legitimate to set a policy that encourages inward migration and rapid growth exceeding past trends would occur. But, if there are no job vacancies after rapid earlier expansion of the town, the logical policy is to discourage inward migration which would lead to growth less than original projections based on past trends.

Berkhamsted broadly fits into the latter category and is now very much a commuter town that retains its Market Town heritage and characteristics. Berkhamsted rightly shares its position in the settlement hierarchy with Tring and should have the same housing target policy to maintain the population level. By DBC’s own calculations that would require growth of 750 dwellings rather than 1180. Expanding the town further will be counter-productive to promoting sustainable housing as the residents will be travelling away from the town for work.

The household projections also take into account the projected decrease in occupancy rates. It had been accepted that by 2031 the occupancy rate would be an average of 2.17 people per household. However, the recently published 2011 Census household figures show that the decrease in occupancy numbers has not progressed at the anticipated rate and numbers per household for Dacorum as whole was more than expected.

Based on this, it is clear that the housing targets produced will prove higher than actually required. The 2011 Census has only been produced for Dacorum and isn't broken down to settlement level, but there is no reason to believe that Berkhamsted will have bucked the general trend observed in Dacorum. Indeed, Berkhamsted is very much a "family" town so it can logically be argued that occupancy rates are likely to be higher than the Dacorum average. Thus, BRAG cannot agree that the apportionment of growth for Berkhamsted has been properly justified.

A counter argument to DBC's housing targets has been put forward by Savills in their "Housing Demand & Socio-Economic Assessment" on behalf of GUI, who are promoting their Green Belt land south of Berkhamsted.

They assert that DBC have underestimated future housing needs and population growths - predictably GUI claim that the greatest errors, if not all, are centred on Berkhamsted.

However, to get to their conclusions Savills manipulate the figures from start to finish. Their report states that the population projections are based on "ONS 2008-based Sub National Population Estimates" but ONS figures are only for Dacorum and ONS predict an increase of just 15.5% for the Borough as a whole.

One can conclude that in splitting the ONS projections into settlement areas, Savills have loaded the figures for Berkhamsted while depressing figures for other settlements. Hemel Hempstead is credited with growth of just 13.4% by Savills over the same period despite being the main commercial settlement which actively advertises for inward migration (see BRAG response to Core Strategy paragraph 3.2).

For Berkhamsted, Savills start with a population figure of 21,824 in 2001 (despite the 2001 Census figure being 18,367) and end with 27,140 in 2031. That represents a growth of 24.4% (or 47.8% if compared to the 2001 Census figure). Savills report goes on to suggest that this growth rate requires an increase in dwellings of 34.8% from 2001 to 2031 in Berkhamsted, while Hemel Hempstead's housing stock needs to grow by only 23.5% to serve local needs.

Indeed, throughout their report Savills refer to "natural growth" but ONS state that its projections "are trend-based, making assumptions about future levels of fertility, mortality and migration". The migration element in the ONS data is not adequately dealt with by Savills.

Natural growth is simply births minus deaths. ONS supplied BRAG with the annual Vital Statics for 2001 to 2010 and the largest annual natural growth rate over that period was 0.63% (lowest 0.19%, median 0.4%, average 0.43%).

For the population of Berkhamsted to increase at the rate Savills suggest, the average natural growth rate over the subsequent 21 years of the study (2011-2031) would need to be 0.89%. That represents a growth rate some 41.3% greater than the previous 10 year high of 0.69% and a 107% greater than the previous 10 year average.

The figures simply do not stack up and one can reasonably conclude that Savills have enforced exaggerated growth patterns on Berkhamsted.

In addition to imposing inflated growth rates to Berkhamsted, Savills blurred the geographic boundaries to include Ashridge Ward within the totals.

Savills justify this by basing their settlement designations on “2005 Medium Super Output Areas (MSOAs) as defined by ONS”, but Ashridge Ward includes the distinct villages of Ringshall, Little Gaddesden, Nettleden, Frithsden and Potten End.

None of these villages can logically be included with Berkhamsted when considering population and local housing requirements. However, by including these villages, Savills effectively inflated the 2001 census baseline by over 17% and this loading error is compounded year on year by Savills exaggerated growth patterns.

The Savills report “Housing Demand & Socio-Economic Assessment” should not be given any credence. The baseline for population growth has been artificially inflated and the error compounded year on year by applying unsubstantiated and exaggerated natural growth rates.

Although BRAG would argue that housing targets should be set to be in line with policies to maintain a stable population (i.e. 750), if we apply the median natural growth rates from the years 2001/10 to the period 2011/31, the increasing housing stock required for the Core Strategy would be just 939, which is still much lower than the 1180 target set by DBC. This supports BRAG’s view that the inclusion of Hanburys (LA4) is unnecessary.

Given the arguments above, it is clear that the higher growth option presented in the CS consultation document was correctly discounted as that would simply have bowed to the demand led and economic model of the land owners and developers who are concentrating on profits rather than developing a balanced strategy.