

ISSUE 6 PROVIDING HOMES

6.1. (a) Are the housing policies consistent with national guidance and supported by clear and robust evidence?

In our submission the level of housing provision proposed by the Council (430 dwellings per annum, equivalent to a total of 10,750 between 2006 and 2031) is neither consistent with national guidance nor supported by clear evidence. In our response to the Pre-Submission consultation we have advocated a housing target of 13,500 (540 dpa).

Our comments as regards the evidence base are provided under question 6.4 below. As regards national guidance, the NPPF stresses in para. 6 that the purpose of the planning system is to contribute to the achievement of sustainable development, whilst paras. 7 -10 expand on the issue by stating that in order to achieve sustainable development a balance needs to be struck between economic, social and environmental needs. Para.17 identifies 12 core principles of planning which include to:

“pro-actively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”

Specifically as regards housing, para. 47 of the NPPF requires Local Authorities to use their evidence-base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework.

Thus there is a prima facie obligation on the Local Authority to identify in full the needs for market and affordable housing, and then to establish a strategy that will meet those needs within a co-ordinated sustainable strategy.

(b) Is the identification of strategic sites and local allocations appropriate and is the status of the SS and LA policies clear?

Table 9 of Core strategy identifies two strategic sites within the Borough, which are located in Berkhamsted and Markyate, they only involve potential developments of 180 and 90 dwellings respectively. However, the proposed allocations identified for Hemel Hempstead which involve significantly larger housing sites and potential green belt releases only have the designation of “local allocations”.

The releases around Hemel Hempstead (which in our submission need to be increased, specifically by the addition of Shendish) are critical to the delivery of the Council’s housing strategy and will inevitably take time to bring forward. Consequently they should ideally be defined as strategic sites and allocated as such in the Core Strategy, a submission we made in response to the 2010 consultation. It appears that this is not now an option without delaying the process of the Core

Dacorum Borough Council Core Strategy Examination in Public

Issue 6 Providing Homes

Thursday 11th October 2012

W. Lamb Reference: 210965

Strategy. By the same token it is in our view inconsistent to allocate much smaller and less significant sites at Berkhamsted and Markyate .

(c) 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?

No comment.

6.2. Is the information in the Strategic Housing Land Availability Assessment (2011) soundly based? Have current economic conditions been taken into account?

Our representations in response to the Core Strategy Pre-submission consultation provide an analysis of the Council's latest housing land availability paper dated July 2011 – see Section 4.3 and Appendix 2.

Sites identified in a SHLAA which are relied upon as part of the Council's housing land supply strategy must be available and deliverable during the plan period. However, we consider that a number of sites in Hemel Hempstead, which have been identified as defined sites/locations, should be excluded or discounted from the capacity figures because of their uncertainty.

There are 20 sites (with a potential capacity of 488 dwellings) identified in the Schedule of Defined Sites and Locations (Appendix 5 of the HLA) which the Council itself has indicated as undeliverable within the Plan period. These 20 sites are indicated in Appendix 2 of our Pre-submission Consultation representations. We also identified 7 sites within the HLA (see Table 3 on page 15 of our Pre-Submission consultation response) which the Council identifies as uncertain in terms of deliverability. These 7 sites have an estimated potential of 1024 dwellings.

In addition we reviewed the list of committed sites in Appendix 4 of the 2011 HLA. Our analysis of these is set out in Table 4 of the response statement on pages 16 - 17. At the time that the HLA was published, development had not commenced on 16 sites, whilst by the time that the representations were submitted 8 sites were still awaiting commencement. Of these we have estimated that 3 sites, with a potential of 22 dwellings, would not come forward because they were exclusively flatted schemes, which are incompatible with current market conditions.

As a result of our analysis of the HLA we demonstrated that there are between 510 and 1534 dwellings which may not come forward during the plan period and should be discounted from the Council's quoted supply of 8879 for Hemel Hempstead (rounded to 8800 Table 8 of the Core Strategy).

Thus in our submission it is clear that overall the information in the HLA and subsequently the housing assumptions in the Core Strategy are not soundly based.

6.3. Is the apportionment of growth between the settlements properly justified?

It is acknowledged that Hemel Hempstead is the pre-eminent settlement in the Borough and should be the focus for the majority of development. We support its status in the settlement hierarchy and the proportional share of growth directed to it.

Bearing in mind however our submission that more housing should be provided overall, this should for the same reason be focused at Hemel Hempstead.

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?

It is considered that the Core Strategy will not meet the fully objectively assessed needs for market and affordable housing. The Council confirms in para. 3.5 of the Selecting the Core Strategy Housing Target Background Paper that to meet the government's household projections it would need to deliver 13,500 dwellings over the Plan Period which is equivalent to 540 dwellings per year. The Housing Needs and Market Assessment Update, July 2012 (HG17) indicates a similar figure – 13,000 or 520 dpa (derived from the ONS 2008-based projections).

It also notes that based on ONS 2010 based sub national population projections the population of Dacorum will increase from 141,600 to 165,900 between 2010 and 2035 a rise of 24,300 or 17.2%. It should be noted however that data from the 2011 Census shows that the population of Dacorum in 2011 was already 144,800 – indicating a higher base population than implied by the 2010 projections. In other words, the latest available demographic data implies that demographically-based housing requirements will be higher over the plan period than the household projections indicate.

In setting its housing target the Council questions the appropriateness of taking account of in-migration given green belt constraints. In para. 3.15 of the Background Paper it states that there has been a fall in in-migration and at para. 3.24 states that through under-provision due to green belt and other factors Dacorum has for many years been a net exporter of households.

The intention of current government policy, expressed most clearly in para 47 of the NPPF, is that the full needs in the housing market area should be met. In this HMA Hemel Hempstead is an important centre which is the focus for a significant proportion of the HMA's housing requirements whilst, in any event, the adjoining districts of St Albans, Watford and Three Rivers are all equally subject to green belt and other constraints. Those Districts are not expecting to meet any of Dacorum's housing requirements.

By not providing housing to reflect established and likely future patterns of in-migration (principally regional) this will exacerbate housing problems. These may include (but are not limited to) putting pressure on existing housing stock, forcing local residents out of the housing market (as has occurred in rural areas, where outsiders can outbid locals for the limited existing stock), and encouraging additional commuting by those who work in the Borough but are unable to live close to where they work because there is insufficient housing in the Borough. Increased house prices and pressure on affordable housing are inevitable consequences.

The Council acknowledges in para. 3.27 of the Background Paper that there is a high demand for affordable housing. It also acknowledges that a demand-led option would deliver more housing (para 3.35) but then effectively dismisses this by stating in para 3.36 that *the Council has not observed the effects of housing need as being unduly serious over recent years.*

Moreover, the measures it proposes to adopt to address affordable housing need (see para. 3.37) all involve management and structural measures within the existing supply. This fails to recognise that the greatest contribution to additional affordable housing will come from additional market

Dacorum Borough Council Core Strategy Examination in Public

Issue 6 Providing Homes

Thursday 11th October 2012

W. Lamb Reference: 210965

housing, an opportunity which is severely compromised by the Council's overriding wish to suppress housing provision below the required level.

A further illustration of the inappropriateness of the Council's approach is provided by para. 5.2 of the Background Paper. As noted above this acknowledges that recent national household projections are a reasonable yardstick for assessing demand. The paper then proceeds to dismiss these projections by saying that they are probably inflated. Not only do the Council fail to provide any evidence to support that statement, they then go on to state that *the effect of some household formation being postponed would not be serious*.

In other words in relation to both affordable housing and housing overall, the Council appears to have assessed the relevant characteristics but not addressed the implications, preferring to dismiss them to fit a pre-existing stance regarding the scale of land release that this implies.

In para. 3.25 of the Background Paper the Council states that it is debatable the extent to which all household formation will materialise given the negative effects of current housing affordability and the recession/employment opportunities on household formation. These factors can lead to a delay in leaving the parental home and transitions to independent living, partnership and family formation. This consideration ignores the long-term nature of the core Strategy. Over a plan period extending to 2031 there will inevitably be a number of fluctuations in economic and other influences on housing demand. A consequence of the recent economic downturn will have been to suppress household formation, but experience shows that a significant element of this is temporary. The resultant increase in hidden households will increase housing demand as the economy recovers.

It appears therefore that the Council is using the current economic situation as an excuse to limit housing development in the Borough and as such is acting against the aims of national planning policy and other government initiatives to stimulate economic growth and provide thriving and mixed communities.

(b) Are the expectations for delivery of existing commitments reasonable?

We have referred to the delivery of existing commitments in response to question 6.2 above. We believe that the Council's assessment of housing supply from existing commitments and allocations is over optimistic.

(c) Is the proposed trajectory realistic and can it be delivered?

The proposed trajectory based on 430 dwellings per year is realistic provided all the identified sources of supply come forward during the plan period. As stated in section 6.2 above there is a potential shortfall of between 510 and 1,534 in the Council's existing estimate of commitments and allocations. For both this reason, and because in our submission a higher housing target should be planned for, the trajectory is not adequate to meet the required delivery.

Part of the Council's rationale for not meeting the demand led scenario in setting a housing target is that historically (for the past 20 years) housing completions have been running at a rate of 361 per year (para. 3.53 of the background paper). On this basis the proposed trajectory of 430 pa is a substantial increase, and higher targets would be 'challenging' or 'exceptionally challenging'. However, it is not said that they cannot be achieved and indeed it should be noted that according to the Council's Residential Land Position Statement April 2012 the number of dwellings completed between 1 April 2011 and 31 March 2012 was 603, approximately 150 dwellings more than was

originally expected. This shows that it is quite possible for the housing industry and the local housing market to achieve a rate of 540 per annum, the rate suggested by our analysis to be required.

(d) What assessment of previously developed land has been undertaken?

Our comments in respect of this issue are set out in relation to question 6.2 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?

No. On the council's own evidence there is little flexibility in the provision against the currently proposed housing target, and on our evidence a clear shortfall (see 6.2 above). Other indications of inflexibility are the under-provision of housing against the evidence base and the lack of green belt safeguarded land.

The land promoted by W Lamb at Shendish represents a clear and suitable resource to increase supply in response to these considerations.

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

This a question that only the Council can answer. However our assessment is that the Council should have allocated more housing land and that their rationale for not doing so (which we have commented on earlier in this statement and in response to Issue 1) is flawed.

6.6. What is the role of neighbouring local planning authorities in accommodating some of Dacorum's housing needs and can it be demonstrated that it is a role which they are undertaking?

The Council has produced a Statement of Compliance with the Duty to Co-operate 2012. Para. 4.18 contains an explicit reference to Dacorum requesting a neighbouring authority, namely Aylesbury Vale Council, to accommodate some of Dacorum's housing - but only if the Council's current housing target is increased following the EIP. We have assumed that there have been similar discussions with St. Albans District should the "Gorhambury" proposal for expansion of Hemel Hempstead into St.Albans District ever come forward.

Apart from the fact that other authorities in the SHMA (Aylesbury Vale not being relevant for this purpose) are themselves constrained by green belt and other factors, exporting housing requirements can only realistically be contemplated if (1) the receiving authorities are explicitly making the provision necessary and (2) it would be consistent with the exporting authority's vision and objectives.

On the first point the relevant authorities are not making such provision and on the second it would not accord with the Council's strategic objectives, especially in the context of Hemel Hempstead as an important sub regional focus.

Dacorum Borough Council Core Strategy Examination in Public

Issue 6 Providing Homes

Thursday 11th October 2012

W. Lamb Reference: 210965

6.7. Proposed minor change MC26 refers to a shortfall in housing provision of 15% being used as a trigger for action by the Council. What is the justification for the 15% figure?

The Council's proposals to encourage sites to come forward if the level of completions falls below 15% in the housing trajectory is impractical even with the suggested change M26. It is unlikely that the Council will be able to react quickly enough to implement sufficient measures to bring forward sites from later phases of the Plan to meet such a shortfall. We believe that such a trigger and the phased release of sites is inappropriate having regard to the housing policies of the NPPF and the specific measures set out in para. 47.

6.8. Should the Core Strategy establish the Council's overall approach to housing densities, as suggested in paragraph 47 of the NPPF?

No comment.

6.9. How will the housing needs of villages in rural areas be met?

No comment.

Requested Changes

- Increase in housing target to 13,500 to meet the requirements of the NPPF
- Focus of additional housing to be at Hemel Hempstead in accordance with the settlement hierarchy and spatial strategy
- Identification of Shendish as a development site for 900 dwellings in accordance with the principles in the proposals put forward by W Lamb Ltd