

Comments on Dacorum Borough Council's Response to Queries Raised by the Inspector during the Examination

Grand Union Investments and Dacorum Borough Council

November 2012

The comments below are additional to those stated in Savills' written representations and made during the Hearings on behalf of GUI. As requested by the Programme Officer, the comments provide a response only to the information provided by DBC in the "Inspector's Queries and Issues for Further Investigation Raised During the Core Strategy Hearing Sessions" document, dated 1st November 2012.

Question 1B: Census 2011

Census 2011:

Provide further information:

- (a) regarding the information currently available (particularly with regard to population, households and migration);
- (b) what the implications are for the Core Strategy and in particular the 11,320 dwellings which the Council considers to be the objectively assessed need; and
- (c) what the programme is for the release of further information.

DBC's response to question 1b highlights its apparent lack of understanding about the nature of the statistics published by ONS and DCLG:

- First, DBC recognises that the population is ageing but assumes that this will simply mean a greater need for communal establishments, suggesting it should not be considered as part of housing need. However, between 2001 and 2011 the number of people aged 65+ increased by 9.95% compared to the total population growth of 5.11%, yet (as shown in Table 5 of DBC's response) the number of people living in communal establishments actually declined. With people living longer and maintaining their independence for longer it is entirely incorrect to simply assume older people will not need standard forms of housing. Indeed, as DBC has noted, older person households tend to be smaller and therefore generate a greater housing need per person when compared to younger age ranges. Furthermore, if the ageing population did result in a greater demand for communal establishments, DBC should be positively planning for it in accordance with NPPF paragraph 50.

- Second, DBC still seem to be confused about how the changes in household size should be regarded in determining the objectively assessed housing need. Household size is a function of the socio-economic and demographic characteristics of the population. As discussed in the first point above, much of the decline in household size is related to the ageing population. It must therefore be a fundamental component when objectively assessing housing need. Paragraph 50 of the NPPF makes it clear that local planning authorities should plan for the needs of different groups of the community and identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. Without understanding changes in household size, and where this is likely to have the most influence, the housing target cannot be compliant with the NPPF.

- Third, DBC do not seem to appreciate that recent increases in the average household size are a symptom of the housing crisis rather than acceptable or intentional changes in the living habits of the population. There is a clear existing demand for housing, which is not completely shown in the household projections, but is seen in DCA's Housing Needs and Market Assessment Update (reference HG17). These people who need housing exist in the Borough already and are undoubtedly a key component of the recent short term increase in household size. The other major component is, as recognised by DBC, the sustained high birth rate (the average over the last five years for Dacorum is 15.57 live births per 1,000 population compared to 12.14 for the East of England and 12.68 for England). This however does not affect the amount of housing required, but rather the type and size of housing (echoing again paragraph 50 of the NPPF).

- Fourth, DBC continue to confuse the objectively assessed need with other factors, particularly in relation to Green Belt and other environmental issues. These issues should have no influence when determining the objectively assessed need. There is undoubtedly a balance needed between growth, protecting communities and the environment, but this should be considered at a later stage in the process once the objectively assessed need is understood. It was clearly pointed out by the Inspector and participants at the Examination that DBC have to start with the latest projections to then consider how these needs can be met through a green belt review. As the Inspector put it to DBC, the

Authority are "under obligation" to meet their "full" housing needs.

In conclusion, DBC still fail to understand what is meant by housing need as set out in paragraphs 47 and 159 of the NPPF, and how this fits into the plan-making process. It is clear that DBC have not produced a sound assessment of housing supply and demand in the context of:

- 1) meeting actual local housing requirements based on the latest ONS household and population projections; and
- 2) in the context of the NPPF in boosting housing supply and identifying deliverable and to accommodate that need (as explained in GUI's response to Question 1.2 and 1.3 of the Issue 1 Participant Statement).

Without a robust assessment of housing need, the Local Plan continues to be unsound.

Question 1 "Inspector's Queries and Correspondence with Dacorum Borough Council Post Hearings, 6th November 2012"

In paragraph 4.9 of HG16, Selecting the Core Strategy Housing Target, it states that the Council 'has continued to appraise the merits of a demand-led housing growth'. Could the Council advise the Inspector where a record of the continuing appraisal can be found?

The estimates put forward by DBC are too simplistic and continue to show a fundamental under appreciation of the complexities in making population and household projections. They do not reflect issues such as changes in age structure resulting from migration (which would occur even in a zero net migration model), the latent existing demand in the local authority area that has resulted from previous under delivery, and the expected reduction in household size due in part to an ageing population. Therefore we advise that these estimates should be disregarded.

DBC have not considered demand-led housing growth. In considering demand it would

be necessary to understand the maximum level of housing the market would sustain over the plan period. In a location such as Dacorum with good transport links to Central London, this would likely be substantially higher than any of the housing targets put forward to date. Our recommendations reflect published projections which, by their nature, are constrained by the level of housing supply in previous years. As such they reflect a pragmatic objective assessment of housing need, but not demand.