

**Statement on behalf of Dacorum Environmental Forum for the Examination of the Dacorum
Development Plan Document October 2016.**

Matter 4 - Housing

1. Is the overall amount of housing provision and its distribution in the Plan consistent with the CS? How has the actual number of dwellings allocated been arrived at? Why the buffer? Should it be greater as suggested by some representors?

(From Development Plan Document Jan 2016)

6.2 The Core Strategy identifies the need to deliver a target of 10,750 dwellings (at an average rate of 430 dwellings per annum) over the period 2006 to 2031. A higher level could be achieved (estimated at around 11,320 homes) if full account is taken of all available sources (i.e. windfalls) (see Table 8 in the Core Strategy). This is reflected in the indicative level of homes in the Place Strategies for each settlement and the countryside.

(From Development Plan Document Jan 2016)

6.17 The housing programme demonstrates that the Core Strategy target can be met and exceeded. The housing trajectory sets out projected completions during the plan period (Appendix 2). If full account is taken of all potential future sources of housing land (e.g. small windfalls on garden land and larger windfall potential) this provides for a reasonable margin to allow some flexibility over housing supply.

Choosing a growth rate of 430 new homes within the Borough each year, for the plan period (2006-2031) has led to a Plan that runs contrary to other elements of the Core Strategy. If the Core Strategy contradicts itself it cannot be regarded as "sound", and neither can the Development Plan Document that depends upon it. The contradicting elements include:

**1.17 "maintain the openness of the areas of the borough designated as Green Belt or Rural Area;"
(Also 1.18, 6.2, 8.29, Policies CS2, CS5)**

Instead of a "Target", 6.2 should refer to a "demand", and should make clear that the demand can only be satisfied within the constraints of the above-quoted sections of the Core Strategy. It should also call for Option 1 to be revisited in the light of the latest Ministerial advice (see the reference under our Statement under "Matter 2"),

Similarly, reference to a "target" should be removed from 6.17, and the "potential future sources of housing land" referred to should be re-allocated to saving Green Belt rather than to maintaining or exceeding a target.